This document gives pertinent information concerning the reissuance of the VPDES Permit listed below. This permit is being processed as Minor, Industrial permit. The discharge results from the operation of a 0.0144 MGD groundwater remediation system. This permit action consists of updating the proposed effluent limits to reflect the current Virginia WQS (effective 6 January 2011) and updating permit language as appropriate. The effluent limitations and special conditions contained in this permit will maintain the Water Quality Standards of 9VAC25-260 et seq.

1.	Facility Name and Mailing Address:	The Nature Conservancy 21335 Signal Hill Plaza Suite 100 Sterling, VA 20164	SIC Code:	4959 Sanitary Services
	Facility Location:	4245 North Fairfax Drive Arlington, VA 22203	County:	Arlington
	Facility Contact Name:	Justin Cooper / Project Geologist	Telephone Number:	703-444-7000
	Facility Email Address:	Justin.Cooper@tetratech.com		
2.	Permit No.:	VA0089796	Expiration Date:	30 January 2012
	Other VPDES Permits:	Not Applicable		
	Other Permits:	Not Applicable		
	E2/E3/E4 Status:	Not Applicable		
3.	Owner Name:	The Nature Conservancy		
	Owner Contact / Title:	Maggie Savage / Foulger-Pratt Management, Inc.	Telephone Number:	703-273-1427
	Owner Email Address:	MSavage@foulgerpratt.com		
4.	Application Complete Date:	10 May 2012		
	Permit Drafted By:	Douglas Frasier	Date Drafted:	1 November 2012
	Draft Permit Reviewed By:	Alison Thompson	Date Reviewed:	16 November 2012
	Public Comment Period:	Start Date: 13 December 2012	End Date:	14 January 2013
5.	Receiving Waters Information:	See **Attachment 1** for the Flow Frequency Determination.		
	Receiving Stream Name:	Lubber Run, UT (storm sewer)	Stream Code:	1aXHX
	Drainage Area at Outfall:	0.61 square miles	River Mile:	0.27
	Stream Basin:	Potomac	Subbasin:	None
	Section:	7	Stream Class:	III
	Special Standards:	b	Waterbody ID:	VAN-A12R
	7Q10 Low Flow:	0.0 MGD	7Q10 High Flow:	Not Applicable
	1Q10 Low Flow:	0.0 MGD	1Q10 High Flow:	Not Applicable
	30Q10 Low Flow:	0.0 MGD	30Q10 High Flow:	Not Applicable
	Harmonic Mean Flow:	Not Applicable	30Q5 Flow:	Not Applicable

6. Statutory or Regulatory Basis for Special Conditions and Effluent Limitations:

- ✓ State Water Control Law
- ✓ Clean Water Act
- ✓ VPDES Permit Regulation
- ✓ EPA NPDES Regulation
- __ EPA Guidelines
- ✓ Water Quality Standards
- ✓ Other: *General VPDES Permit Regulation for Discharges From Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests* – 9VAC25-120 et seq.
  EPA Primary Drinking Water Standards.

7. **Licensed Operator Requirements:** Not Applicable

8. **Reliability Class:** Not Applicable

9. **Permit Characterization:**

✓ Private	✓ Effluent Limited	___ Possible Interstate Effect
___ Federal	✓ Water Quality Limited	___ Compliance Schedule Required
___ State	___ Toxics Monitoring Program Required	___ Interim Limits in Permit
___ WTP	___ Pretreatment Program Required	___ Interim Limits in Other Document
___ TMDL		

10. **Wastewater Sources and Treatment Description:**

In 1997, The Nature Conservancy constructed an eight story office building to serve as its headquarters. The site (groundwater and soils) was contaminated with petroleum products and chlorinated solvents. The petroleum contamination was attributed to the operation of a gasoline station which operated on the site from 1935 to 1953 and as an auto repair shop from 1957 to 1974. The chlorinated solvents originated from a dry cleaning store operating nearby. In February 1997, under the Virginia Voluntary Remediation Program, groundwater remediation was initiated as part of the construction activities. A VPDES permit was issued in January 1998 for the discharge of the remediated groundwater.

The groundwater treatment system consists of an air stripper and associated equipment consisting of sump pumps, carbon absorbers and piping. Perforated piping beneath the building's sub grade floors collect and direct the groundwater to a sump where it is pumped to the air stripper. Air is introduced in order to strip the volatile organic compounds (VOCs) from the water. The exhaust air is routed through carbon filters prior to being vented to the atmosphere while the treated water is discharged via Outfall 001.

The system is designed for 10 gallons per minute (gpm). Treated effluent from the system is discharged to a storm sewer along North Taylor Street, eventually draining to Lubber Run.

See **Attachment 2** for the NPDES Permit Rating Worksheet.
See **Attachment 3** for a facility schematic/diagram.

TABLE 1
OUTFALL DESCRIPTION

Outfall Number	Discharge Sources	Treatment	Max 30-day Flow	Latitude / Longitude
001	Industrial Wastewater/Groundwater	See Section 10 above	0.0144 MGD	38° 52′ 57″ / 77° 06′ 45″

See **Attachment 4** for the West Washington topographic map.

11. **Solids Treatment and Disposal Methods:**

There are no solids generated with the operation of this treatment system.

12. **Discharges Located Within Waterbody VAN-A12R:**

TABLE 2
DISCHARGES WITHIN WATERBODY VAN-A12R

Permit Number	Facility Name	Type	Receiving Stream
VA0025143	Arlington County Water Pollution Control Facility	Municipal Individual Permit	Four Mile Run

TABLE 2
(continued)

Permit Number	Facility Name	Type	Receiving Stream
VAR051296	US Joint Base – Myer Henderson Hall	Stormwater Industrial General Permit	Potomac River, UT
VAG110087	Virginia Concrete Company, Inc. – Shirlington	Ready Mix Concrete General Permit	Four Mile Run
VAG830428	R F and P Facility	Petroleum Remediation General Permits	Occoquan River, UT
VAG830393	1716 Wilson LLC Property		Potomac River
VAG830340	1812 Holdings LLC Property		Little River
VAG830433	Lodestar Inc. Property		Rocky Run
VAG830436	Pentagon Industrial Complex		Roaches Run
VAG830101	Ballston Common Associates LP		Lubber Run
VAG830321	Halstead at Arlington		Long Branch
VAG830337	Shell 139445 – Columbia Pike		Four Mile Run
VAG830419	Founders Square Lot 3A		Doctors Branch
VAG830420	Alexandria City Tax Map 054 04 10		Potomac River
VAG750173	BMW of Arlington	Car Wash General Permits	Four Mile Run
VAG750208	Avis Car Rental – 3206 10th St N		Rocky Run
VAG750155	Universal Air and Vacuum Service		Four Mile Run
VAG750156	BP Amoco 84667		Four Mile Run
VAG750192	C and G Imports Wilson Blvd		Spout Run

13. **Material Storage:** There are no chemicals used or stored at this facility.

14. **Site Inspection:** Performed by DEQ-NRO staff on 17 November 2012 (see **Attachment 5**).

15. **Receiving Stream Water Quality and Water Quality Standards:**

a. Ambient Water Quality Data

This facility discharges to an unnamed tributary to Lubber Run (storm sewer). There is no water quality monitoring data for the receiving stream. The nearest downstream DEQ monitoring station is 1aFOU004.22, located on Fourmile Run at the Route 244 bridge crossing, approximately 2.4 miles downstream of Outfall 001. The following is the water quality summary for this segment of Fourmile Run, as taken from the Draft 2012 Integrated Report*:

Class III, Section 7, special standards "b".

DEQ ambient monitoring stations 1aFOU001.92, at West Glebe Road, 1aFOU002.02, upstream of South Glebe Road, 1aFOU004.22, at Route 244, and 1aFOU005.60, at Carlyn Springs Road. Citizen monitoring stations 1aFOU-1-ACM, 1aFOU-2-ACM, 1aFOU-3-ACM, 1aFOU-4-ACM, 1aFOU-5-ACM, 1aFOU-6-ACM, 1aFOU-7-ACM, 1aFOU-8-ACM, 1aFOU-9-ACM, and 1aFOU-11-ACM.

E. coli monitoring finds a bacterial impairment, resulting in an impaired classification for the recreation use. The *E. coli* data collected by the citizen monitoring group indicate that a water quality issue may exist for the recreation use. A bacteria TMDL for the Fourmile Run watershed has been completed and approved.

The aquatic life and wildlife uses are considered fully supporting, with the aquatic life use noted with observed effects, described above.

The fish consumption use is fully supporting with observed effects. SPMD data revealed an exceedance of the human health criteria of 0.64 parts per billion (ppb) for polychlorinated biphenyls (PCBs), which is noted with an observed effect. A PCB TMDL for the tidal Potomac River watershed has been completed and approved.

*The Draft 2012 Integrated Report (IR) has been through the public comment period and reviewed by EPA. The 2012 IR is currently being finalized and prepared for release.

b. 303(d) Listed Stream Segments and Total Maximum Daily Loads (TMDLs)

TABLE 3
IMPAIRMENTS/TMDL ASSESSMENT

Waterbody Name	Impaired Use	Cause	Distance From Outfall	TMDL completed	WLA	Basis for WLA	TMDL Schedule
*Impairment Information in the Draft 2012 Integrated Report**							
Fourmile Run	Recreation	*E. coli*	1.5 miles	Four Mile Run Bacteria 5/31/2002	None	---	N/A
Fourmile Run (Tidal)	Fish Consumption	PCB	5.1 miles	Tidal Potomac PCB 10/31/2007	None	---	N/A
		Chlordane	5.1 miles	N/A	---	---	2022

**The Draft 2012 Integrated Report (IR) has been through the public comment period and reviewed by EPA. The 2012 IR is currently being finalized and prepared for release.*

The full planning statement is found in **Attachment 6**.

c. Receiving Stream Water Quality Criteria

Part IX of 9VAC25-260(360-550) designates classes and special standards applicable to defined Virginia river basins and sections. The receiving stream Lubber Run, UT, is located within Section 7 of the Potomac River Basin and classified as Class III water.

At all times, Class III waters must achieve a dissolved oxygen (D.O.) of 4.0 mg/L or greater, a daily average D.O. of 5.0 mg/L or greater, a temperature that does not exceed 32°C and maintain a pH of 6.0-9.0 standard units (S.U.).

Attachment 7 details other water quality criteria applicable to the receiving stream.

d. Receiving Stream Special Standards

The State Water Control Board's Water Quality Standards, River Basin Section Tables (9VAC25-260-360, 370 and 380) designates the river basins, sections, classes and special standards for surface waters of the Commonwealth of Virginia. The receiving stream, Lubber Run, UT, is located within Section 7 of the Potomac River Basin. This section has been designated with a special standard of "b".

Special Standard "b" (Potomac Embayment Standards) established effluent standards for all sewage plants discharging into Potomac River embayments and for expansions of existing plants discharging into non-tidal tributaries of these embayments. 9VAC25-415, Policy for the Potomac Embayments, controls point source discharges of conventional pollutants into the Virginia embayment waters of the Potomac River and their tributaries from the fall line at Chain Bridge in Arlington County to the Route 301 Bridge in King George County. The regulation sets effluent limits for BOD_5, total suspended solids, phosphorus and ammonia to protect the water quality of these high profile waterbodies.

The Potomac Embayment Standards are not applicable to this discharge since corrective action remediation systems were explicitly exempt (9VAC25-415-30.D.) and this operation does not discharge those pollutants of concern.

e. Threatened or Endangered Species

The Virginia DGIF Fish and Wildlife Information System Database was searched on 31 July 2012 for records to determine if there are threatened or endangered species in the vicinity of the discharge. The following threatened or endangered species were identified within a 2 mile radius of the discharge: Atlantic Sturgeon; Brook Floater (mussel); Wood Turtle; Upland Sandpiper (song bird); Loggerhead Shrike (song bird); Henslow's Sparrow; Appalachian Grizzled Skipper (butterfly); Bald Eagle; and Migrant Loggerhead Shrike (song bird). The limits proposed in this draft permit are protective of the Virginia Water Quality Standards and protect the threatened and endangered species found near the discharge.

16. Antidegradation (9VAC25-260-30):

All state surface waters are provided one of three levels of antidegradation protection. For Tier 1 or existing use protection, existing uses of the water body and the water quality to protect these uses must be maintained. Tier 2 water bodies have water quality that is better than the water quality standards. Significant lowering of the water quality of Tier 2 waters is not allowed without an evaluation of the economic and social impacts. Tier 3 water bodies are exceptional waters and are so designated by regulatory amendment. The antidegradation policy prohibits new or expanded discharges into exceptional waters.

The receiving stream is located within a highly urbanized area and at times the stream flow will be comprised of only effluent. It is staff's best professional judgment that such streams are Tier 1. Permit limits proposed have been established which will result in attaining and/or maintaining all water quality criteria which apply to the receiving stream, including narrative criteria. These limitations will provide for the protection and maintenance of all existing uses.

17. Effluent Screening and Effluent Limitation Development:

To determine water quality-based effluent limitations for a discharge, the suitability of data must first be determined. Data is suitable for analysis if one or more representative data points are equal to or above the quantification level ("QL") and the data represent the exact pollutant being evaluated.

a. Effluent Screening:

Effluent data obtained from the June 2008 – May 2012 Discharge Monitoring Reports (DMRs) has been reviewed and determined to be suitable for evaluation. Please see **Attachment 8** for a summary of effluent data.

b. Effluent Limitations, Outfall 001 – Toxic Pollutants

9VAC25-31-220.D. requires limits be imposed where a discharge has a reasonable potential to cause or contribute to an in-stream excursion of water quality criteria. Those parameters with WLAs that are near effluent concentrations are evaluated for limits.

The VPDES Permit Regulation at 9VAC25-31-230.D requires that monthly and weekly average limitations be imposed for continuous discharges from POTWs and monthly average and daily maximum limitations be imposed for all other continuous non-POTW discharges.

Staff compared the treatment system capabilities, the Virginia Water Quality Standards (9VAC25-260), the EPA National Primary Drinking Water Standards and the *General VPDES Permit for Discharges from Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests* (9VAC25-120 et seq.), in order to develop the appropriate limitations for this treatment system.

Benzene, toluene, ethylbenzene and xylene are common constituents of automotive gasoline. Effluent limitations for benzene, toluene and xylene were based on staff's best professional judgement regarding the removal capability of the air stripper during the last permit reissuance. These limitations are proposed to be carried forward with this reissuance.

The limitation for ethylbenzene was based on aquatic chronic toxicity documented in the Fact Sheet for the *General VPDES Permit for Discharges from Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests* (9VAC25-120 et seq.); as was1,1,1-trichloroethane. These limitations will also be carried forward.

A limit of 15 µg/L for 1,2-dichlorobenzene was based on chronic toxicity during the previous reissuance. This is more stringent than the limit set forth in the *General VPDES Permit for Discharges from Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests* (9VAC25-120 et seq.) at 15.8 µg/L. Due to antibacksliding provisions located at 9VAC25-31-220.L., staff proposes that the current limitation be carried forward with this reissuance.

The following effluent limitations were based on the Drinking Water Standards maximum permissible level of contamination (MCL) during the last reissuance and are proposed to be carried forward with this reissuance: 1,1-dichloroethylene; cis 1,2-dichloroethylene; trans 1,2-dichloroethylene; dichloromethane; trichloroethylene (TCE); tetrachloroethylene (PCE); 1,2-dichloroethane; and vinyl chloride.

Chloroform limitations are based on the *General VPDES Permit for Discharges from Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests* (9VAC25-120 et seq.) at 100 µg/L.

The effluent limitation for carbon tetrachloride was based on the Human Health related Water Quality Standards for Public Water Supplies during the last reissuance. It was staff's best professional judgement during that time that this limit was most protective of the receiving stream and public health even though this facility does not discharge into a public water supply. It is proposed the current limit be carried forward with this reissuance.

Table 4 summarizes the above discussion.

TABLE 4
EFFLUENT LIMITATION MATRIX [1]

Parameter	Technology Installed	Drinking Water MCL	Water Quality Standards [2]	Petroleum General Permit [3]	Best Professional Judgement [4]	Proposed Effluent Limit
Benzene	5	5	510	50	--	5
Toluene	5	1,000	6000	175	--	5
Ethylbenzene	--	700	2100	320	--	320
Total Xylene	5	10,000	--	33	--	5
Dichloromethane	--	5	--	--	--	5
Tetrachloromethane (Carbon Tetrachloride)	--	5	16	2.5	2	2
1,1-Dichloroethylene (1,1 DCE)	--	7	7,100	7	--	7
cis 1,2-Dichloroethylene	--	70	--	70	--	70
trans 1,2-Dichloroethylene	--	100	10,000	100	--	100
Trichloroethylene (TCE)	--	5	300	5	--	5
Tetrachloroethylene (PCE)	--	5	33	5	--	5
1,2-Dichloroethane (1,2 DCA)	--	5	370	990	--	5
1,1,1 Trichloroethane	--	200	--	112	--	112
Chloroform	--	--	11,000	100	--	100
Vinyl Chloride	--	2	24	2	--	2
1,2-Dichlorobenzene	--	600 [5]	1,300	15.8	15	15

[1] Units are in micrograms per liter (µg/L).
[2] Human Health – All Other Surface Waters (effective 6 January 2011).
[3] 9VAC25-120 et seq. (effective 26 February 2008).
[4] Per last reissuance.
[5] Primary Drinking Water MCL lists this pollutant as ortho-dichlorobenzene which is the same chemical.

The total volatile organic compound (VOC) is limited so that VOCs that were not detected or evident during the issuance of this permit are not discharged in toxic amounts. The Total VOC limit is determined by totaling the limits of the individual VOCs of concern.

c. Effluent Limitations and Monitoring, Outfall 001 – Conventional and Non-Conventional Pollutants

pH limitations are set at the water quality criteria.

d. Effluent Limitations and Monitoring Summary

The effluent limitations are presented in the following table. Limits were established for benzene; toluene; ethylbenzene; total xylene; carbon tetrachloride; chloroform; 1,1,1-trichloroethane; 1,2-dichlorobenzene; 1,1-dichloroethylene; cis 1,2-dichloroethylene; trans 1,2-dichloroethylene; dichloromethane; trichloroethylene (TCE); tetrachloroethylene (PCE); 1,2-dichloroethane; vinyl chloride and 1,2-dichlorobenzene.

Sample Types are in accordance with the recommendations in the VPDES Permit Manual.

The Sample Frequencies were reduced from once per calendar quarter to once per six (6) months (semi-annual) during the last reissuance based upon the permittee's request and performance of the air-stripper during the previous permit term. This frequency will be carried forward with this reissuance.

18. Antibacksliding:

All limits in this permit are at least as stringent as those previously established. Backsliding does not apply to this reissuance.

19. Effluent Limitations/Monitoring Requirements:

Maximum Flow of this remediation operation is 0.0144 MGD.
Effective Dates: During the period beginning with the permit's effective date and lasting until the expiration date.

PARAMETER	BASIS FOR LIMITS	DISCHARGE LIMITATIONS				MONITORING REQUIREMENTS	
		Monthly Average	Daily Maximum	Minimum	Maximum	Frequency	Sample Type
Flow (MGD)	NA	NL	NA	NA	NL	1/6M	Estimate
pH	3	NA	NA	6.0 S.U.	9.0 S.U.	1/6M	Grab
Benzene	2,4	NA	NA	NA	5.0 µg/L	1/6M	Grab
Toluene	2	NA	NA	NA	5.0 µg/L	1/6M	Grab
Ethylbenzene	2,5	NA	NA	NA	320 µg/L	1/6M	Grab
Total Xylene	2	NA	NA	NA	5.0 µg/L	1/6M	Grab
Dichloromethane	2,4	NA	NA	NA	5.0 µg/L	1/6M	Grab
Tetrachloromethane (Carbon Tetrachloride)	2	NA	NA	NA	2.0 µg/L	1/6M	Grab
1,1-Dichloroethylene (1,1 DCE)	2,4,5	NA	NA	NA	7.0 µg/L	1/6M	Grab
cis 1,2-Dichloroethylene	2,4,5	NA	NA	NA	70 µg/L	1/6M	Grab
trans 1,2-Dichloroethylene	2,4,5	NA	NA	NA	100 µg/L	1/6M	Grab
Trichloroethylene (TCE)	2,4,5	NA	NA	NA	5.0 µg/L	1/6M	Grab
Tetrachloroethylene (PCE)	2,4,5	NA	NA	NA	5.0 µg/L	1/6M	Grab
1,2-Dichloroethane (1,2 DCA)	2,4	NA	NA	NA	5.0 µg/L	1/6M	Grab
1,1,1 Trichloroethane	2,5	NA	NA	NA	112 µg/L	1/6M	Grab
Chloroform	2,5	NA	NA	NA	100 µg/L	1/6M	Grab
Vinyl Chloride	2,4,5	NA	NA	NA	2.0 µg/L	1/6M	Grab
1,2-Dichlorobenzene	2	NA	NA	NA	15 µg/L	1/6M	Grab
Total Volatile Organic Compounds (Total VOCs)	2	NA	NA	NA	763 µg/L	1/6M	Calculated

The basis for the limitations codes are:

1. Federal Effluent Requirements
2. Best Professional Judgement
3. Water Quality Standards
4. Primary Drinking Water Standards MCL
5. *General VPDES Permit Regulation for Discharges From Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests* (9VAC25-120 et seq.)

MGD = Million gallons per day.
NA = Not applicable.
NL = No limit; monitor and report.
S.U. = Standard units.

1/6M = Once every six (6) months.*

Estimate = Reported flow is to be based on the technical evaluation of the sources contributing to the discharge.
Grab = An individual sample collected over a period of time not to exceed 15-minutes.

*The semiannual monitoring periods shall be January through June and July through December.
The DMR shall be submitted no later than the 10th day of the month following the monitoring period.

20. Other Permit Requirements:

Part I.B. of the permit contains quantification levels and compliance reporting instructions

9VAC25-31-190.L.4.c. requires an arithmetic mean for measurement averaging and 9VAC25-31-220.D. requires limits be imposed where a discharge has a reasonable potential to cause or contribute to an in-stream excursion of water quality criteria. Specific analytical methodologies for toxics are listed in this permit section as well as quantification levels (QLs) necessary to demonstrate compliance with applicable permit limitations or for use in future evaluations to determine if the pollutant has reasonable potential to cause or contribute to a violation. Required averaging methodologies are also specified.

21. Other Special Conditions:

a. O&M Manual Requirement. Required by VPDES Permit Regulation, 9VAC25-31-190.E. The permittee shall maintain a current Operations and Maintenance (O&M) Manual. The permittee shall operate the treatment works in accordance with the O&M Manual and shall make the O&M Manual available to Department personnel for review upon request. Any changes in the practices and procedures followed by the permittee shall be documented in the O&M Manual within 90 days of the effective date of the changes. Non-compliance with the O&M Manual shall be deemed a violation of the permit.

b. Materials Handling/Storage. 9VAC25-31-50.A prohibits the discharge of any wastes into State waters unless authorized by permit. Code of Virginia §62.1-44.16 and §62.1-44.17 authorize the Board to regulate the discharge of industrial waste or other waste.

c. TMDL Reopener. This special condition allows the permit to be reopened if necessary to bring it into compliance with any applicable TMDL that may be developed and approved for the receiving stream.

22. Permit Section Part II. Part II of the permit contains standard conditions that appear in all VPDES Permits. In general, these standard conditions address the responsibilities of the permittee, reporting requirements, testing procedures and records retention.

23. Changes to the Permit from the Previously Issued Permit:

a. Special Conditions:

- The Water Quality Criteria Reopener was removed with this reissuance since it is not applicable to this discharge.

b. Monitoring and Effluent Limitations: None.

c. Other:

- Part II of the permit has been updated to include VELAP requirements.

24. Variances/Alternate Limits or Conditions: None.

25. Public Notice Information:

First Public Notice Date: 12 December 2012 Second Public Notice Date: 19 December 2012

Public Notice Information is required by 9VAC25-31-280 B. All pertinent information is on file and may be inspected, and copied by contacting the: DEQ Northern Regional Office; 13901 Crown Court; Woodbridge, VA 22193; Telephone No. (703) 583-3873; Douglas.Frasier@deq.virginia.gov. See **Attachment 9** for a copy of the public notice document.

Persons may comment in writing or by email to the DEQ on the proposed permit action, and may request a public hearing, during the comment period. Comments shall include the name, address and telephone number of the writer and of all persons represented by the commenter/requester and shall contain a complete, concise statement of the factual basis for comments. Only those comments received within this period will be considered. The DEQ may decide to hold a public hearing, including another comment period, if public response is significant and there are substantial, disputed issues relevant to the permit. Requests for public hearings shall state 1) the reason why a hearing is requested; 2) a brief, informal statement regarding the nature and extent of the interest of the requester or of those represented by the requester, including how and to what extent such interest would be directly and adversely affected by the permit; and 3) specific references, where possible, to terms and conditions of the permit with suggested revisions. Following the comment period, the Board will make a determination regarding the proposed permit action.

This determination will become effective, unless the DEQ grants a public hearing. Due notice of any public hearing will be given. The public may request an electronic copy of the draft permit and fact sheet or review the draft permit and application at the DEQ Northern Regional Office by appointment.

26. Additional Comments:

Previous Board Action(s):	None.
Staff Comments:	None.
Public Comment:	No comments were received during the public notice.
EPA Checklist:	The checklist can be found in **Attachment 10**.

Fact Sheet Attachments

Table of Contents

Nature Conservancy
VA0089796
2013 Reissuance

MEMORANDUM

DEPARTMENT OF ENVIRONMENTAL QUALITY - WATER DIVISION
Water Quality Assessments and Planning
629 E. Main Street P.O. Box 10009 Richmond, Virginia 23240

SUBJECT: Flow Frequency Determination
The Nature Conservancy - Issuance

TO: James Engbert, NRO

FROM: Paul E. Herman, P.E., WQAP

DATE: October 28, 1997

COPIES: Ron Gregory, Charles Martin, File

The Nature Conservancy is proposing a discharge to an unnamed tributary to Lubber Run in Arlington, VA. Stream flow frequencies are required at this site for use by the permit writer in developing effluent limitations for the VPDES permit.

At the discharge point, the receiving stream is a storm sewer which drains to Lubber Run. The flow frequencies for storm sewers are 0.0 cfs for the 1Q10, 7Q10, 30Q5, high flow 1Q10, high flow 7Q10, and harmonic mean. Flow frequencies have been determined for the perennial Lubber Run at the Fairfax Drive bridge.

The USGS operated a continuous record gage on the Fourmile Run at Alexandria, VA (#01652500) from 1951 to 1969, from 1973 to 1975 and from 1979 to 1982. The gage was located at the Shirlington Road bridge in Alexandria, VA. The flow frequencies for the gage and the discharge point are presented below. The values at the Fairfax Drive bridge over Lubber Run were determined by drainage area proportions and do not address any withdrawals, discharges, or springs lying upstream.

Fourmile Run at Alexandria, VA (#01652500):

Drainage Area = 13.8 mi^2

1Q10 = 0.88 cfs	High Flow 1Q10 = -- cfs
7Q10 = 1.1 cfs	High Flow 7Q10 = -- cfs
30Q5 = 2.4 cfs	HM = 5.1 cfs

Lubber Run at Fairfax Dive bridge:

Drainage Area = 0.61 mi^2

1Q10 = 0.04 cfs	High Flow 1Q10 = -- cfs
7Q10 = 0.05 cfs	High Flow 7Q10 = -- cfs
30Q5 = 0.11 cfs	HM = 0.23 cfs

For such a small drainage area, it is a dry stream. with 1Q10 and 7Q10 = 0.

The high flow months were not contiguous, therefore, high flow frequencies could not be determined. If you have any questions concerning this analysis, please let me know.

NPDES PERMIT RATING WORK SHEET

[X] Regular Addition
[ ] Discretionary Addition
[ ] Score change, but no status Change
[ ] Deletion

VPDES NO. : VA0089796

Facility Name: The Nature Conservancy
City / County: Arlington / Arlington
Receiving Water: Lubber Run, UT
Waterbody ID: VAN-A12R

Is this facility a steam electric power plant (sic =4911) with one or more of the following characteristics?

1. Power output 500 MW or greater (not using a cooling pond/lake)
2. A nuclear power Plant
3. Cooling water discharge greater than 25% of the receiving stream's 7Q10 flow rater

[ ] Yes; score is 600 (stop here) [X] NO; (continue)

Is this permit for a municipal separate storm sewer serving a population greater than 100,000?

[ ] YES; score is 700 (stop here)
[X] NO; (continue)

FACTOR 1: Toxic Pollutant Potential

PCS SIC Code: _____ Primary Sic Code: 4959 Other Sic Codes: _____ _____ _____

Industrial Subcategory Code: 000 (Code 000 if no subcategory)

Determine the Toxicity potential from Appendix A. Be sure to use the TOTAL toxicity potential column and check one)

Toxicity Group	Code	Points	Toxicity Group	Code	Points	Toxicity Group	Code	Points
[ ] No process waste streams	0	0	[ ] 3.	3	15	[ ] 7.	7	35
[X] 1.	1	5	[ ] 4.	4	20	[ ] 8.	8	40
[ ] 2.	2	10	[ ] 5.	5	25	[ ] 9.	9	45
			[ ] 6.	6	30	[ ] 10.	10	50

Code Number Checked: 1

Total Points Factor 1: 5

FACTOR 2: Flow/Stream Flow Volume (Complete either Section A or Section B; check only one)

Section A – Wastewater Flow Only considered

Wastewater Type (see Instructions)			Code	Points
Type I:	Flow < 5 MGD	[ ]	11	0
	Flow 5 to 10 MGD	[ ]	12	10
	Flow > 10 to 50 MGD	[ ]	13	20
	Flow > 50 MGD	[ ]	14	30
Type II:	Flow < 1 MGD	[ ]	21	10
	Flow 1 to 5 MGD	[ ]	22	20
	Flow > 5 to 10 MGD	[ ]	23	30
	Flow > 10 MGD	[ ]	24	50
Type III:	Flow < 1 MGD	[ ]	31	0
	Flow 1 to 5 MGD	[ ]	32	10
	Flow > 5 to 10 MGD	[ ]	33	20
	Flow > 10 MGD	[ ]	34	30

Section B – Wastewater and Stream Flow Considered

Wastewater Type (see Instructions)	Percent of Instream Wastewater Concentration at Receiving Stream Low Flow		Code	Points
Type I/III:	< 10 %	[ ]	41	0
	10 % to < 50 %	[ ]	42	10
	> 50%	[ ]	43	20
Type II:	< 10 %	[ ]	51	0
	10 % to < 50 %	[ ]	52	20
	> 50 %	[X]	53	30

Code Checked from Section A or B: 53

Total Points Factor 2: 30

NPDES PERMIT RATING WORK SHEET

FACTOR 3: Conventional Pollutants

(only when limited by the permit)

A. Oxygen Demanding Pollutants: (check one) ☐ BOD ☐ COD ☒ Other: Volatile Organic Compounds

Permit Limits: (check one)	Code	Points
☒ < 100 lbs/day	1	0
☐ 100 to 1000 lbs/day	2	5
☐ > 1000 to 3000 lbs/day	3	15
☐ > 3000 lbs/day	4	20

Code Number Checked: 1

Points Scored: 0

B. Total Suspended Solids (TSS)

Permit Limits: (check one)	Code	Points
☐ < 100 lbs/day	1	0
☐ 100 to 1000 lbs/day	2	5
☐ > 1000 to 5000 lbs/day	3	15
☐ > 5000 lbs/day	4	20

Code Number Checked: NA

Points Scored: 0

C. Nitrogen Pollutants: (check one) ☐ Ammonia ☐ Other: _____

Permit Limits: (check one)	*Nitrogen Equivalent*	Code	Points
☐	< 300 lbs/day	1	0
☐	300 to 1000 lbs/day	2	5
☐	> 1000 to 3000 lbs/day	3	15
☐	> 3000 lbs/day	4	20

Code Number Checked: NA

Points Scored: 0

Total Points Factor 3: 0

FACTOR 4: Public Health Impact

Is there a public drinking water supply located within 50 miles downstream of the effluent discharge (this include any body of water to which the receiving water is a tributary)? A public drinking water supply may include infiltration galleries, or other methods of conveyance that ultimately get water from the above reference supply.

☐ YES; (If yes, check toxicity potential number below)

☒ NO; (If no, go to Factor 5)

Determine the *Human Health* potential from Appendix A. Use the same SIC doe and subcategory reference as in Factor 1. (Be sure to use the *Human Health* toxicity group column – check one below)

Toxicity Group	Code	Points	Toxicity Group	Code	Points	Toxicity Group	Code	Points
☐ No process waste streams	0	0	☐ 3.	3	0	☐ 7.	7	15
☐ 1.	1	0	☐ 4.	4	0	☐ 8.	8	20
☐ 2.	2	0	☐ 5.	5	5	☐ 9.	9	25
			☐ 6.	6	10	☐ 10.	10	30

Code Number Checked: NA

Total Points Factor 4: 0

NPDES PERMIT RATING WORK SHEET

FACTOR 5: Water Quality Factors

A. *Is (or will) one or more of the effluent discharge limits based on water quality factors of the receiving stream (rather than technology-base federal effluent guidelines, or technology-base state effluent guidelines), or has a wasteload allocation been to the discharge*

		Code	Points
[ ]	YES	1	10
[X]	NO	2	0

B. *Is the receiving water in compliance with applicable water quality standards for pollutants that are water quality limited in the permit?*

		Code	Points
[X]	YES	1	0
[ ]	NO	2	5

C. *Does the effluent discharged from this facility exhibit the reasonable potential to violate water quality standards due to whole effluent toxicity?*

		Code	Points
[ ]	YES	1	10
[X]	NO	2	0

Code Number Checked: A 2 B 1 C 2

Points Factor 5: A 0 + B 0 + C 0 = **0**

FACTOR 6: Proximity to Near Coastal Waters

A. Base Score: Enter flow code here (from factor 2) 53

Check appropriate facility HPRI code (from PCS):

	HPRI#	Code	HPRI Score
[ ]	1	1	20
[ ]	2	2	0
[ ]	3	3	30
[X]	4	4	0
[ ]	5	5	20

HPRI code checked : 4

Enter the multiplication factor that corresponds to the flow code: 0.60

Flow Code	Multiplication Factor
11, 31, or 41	0.00
12, 32, or 42	0.05
13, 33, or 43	0.10
14 or 34	0.15
21 or 51	0.10
22 or 52	0.30
23 or 53	0.60
24	1.00

Base Score (HPRI Score): 0 X (Multiplication Factor) 0.60 = 0

B. Additional Points – NEP Program

For a facility that has an HPRI code of 3, does the facility discharge to one of the estuaries enrolled in the National Estuary Protection (NEP) program (see instructions) or the Chesapeake Bay?

	Code	Points
[ ]	1	10
[X]	2	0

C. Additional Points – Great Lakes Area of Concern

For a facility that has an HPRI code of 5, does the facility discharge any of the pollutants of concern into one of the Great Lakes' 31 area's of concern (see instructions)?

	Code	Points
[ ]	1	10
[X]	2	0

Code Number Checked: A 4 B 2 C 2

Points Factor 6: A 0 + B 0 + C 0 = **0**

NPDES PERMIT RATING WORK SHEET

SCORE SUMMARY

Factor	Description	Total Points
1	Toxic Pollutant Potential	5
2	Flows / Streamflow Volume	30
3	Conventional Pollutants	0
4	Public Health Impacts	0
5	Water Quality Factors	0
6	Proximity to Near Coastal Waters	0
	TOTAL (Factors 1 through 6)	35

S1. Is the total score equal to or grater than 80 ☐ YES; (Facility is a Major) ☒ NO

S2. If the answer to the above questions is no, would you like this facility to be discretionary major?

☒ NO

☐ YES; (Add 500 points to the above score and provide reason below:

Reason: _____

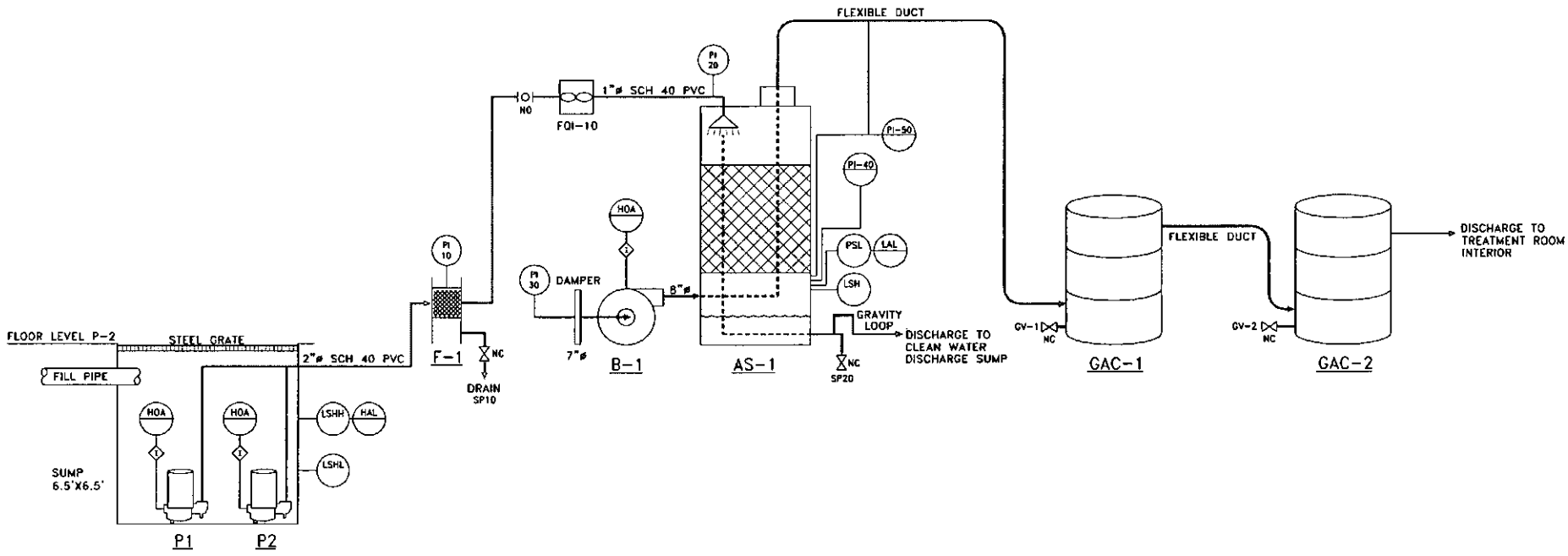
NEW SCORE : 35

OLD SCORE : 35

Permit Reviewer's Name : Douglas Frasier

Phone Number: (703) 583-3873

Date: 23 October 2012



PUMPS P1 & P2

MANUFACTURER:	STA-RITE
MODEL:	700E
MATERIAL:	CAST IRON

FILTER F-1

MANUFACTURER:	KRYSTAL CLEAR FILTER
MODEL:	20" HIGH, 4.5ø, 500 PSI
MATERIAL:	STEEL

BLOWER B-1

MANUFACTURER:	AMERICAN FAN CO.
MODEL:	AF-15
MATERIAL:	ALUMINUM

AIR STRIPPER A-1

MANUFACTURER:	NORTH EAST ENVIRONMENTAL PRODUCTS
MODEL:	2331P
MATERIAL:	PLASTIC

VAPOR PHASE CARBON VESSELS GAC1 & GAC2

MANUFACTURER:	TETRASOLV FILTRATION
MODEL:	VF 500
MATERIAL:	STEEL

TITLE: GROUNDWATER TREATMENT SYSTEM
PIPING & INSTRUMENTATION DIAGRAM

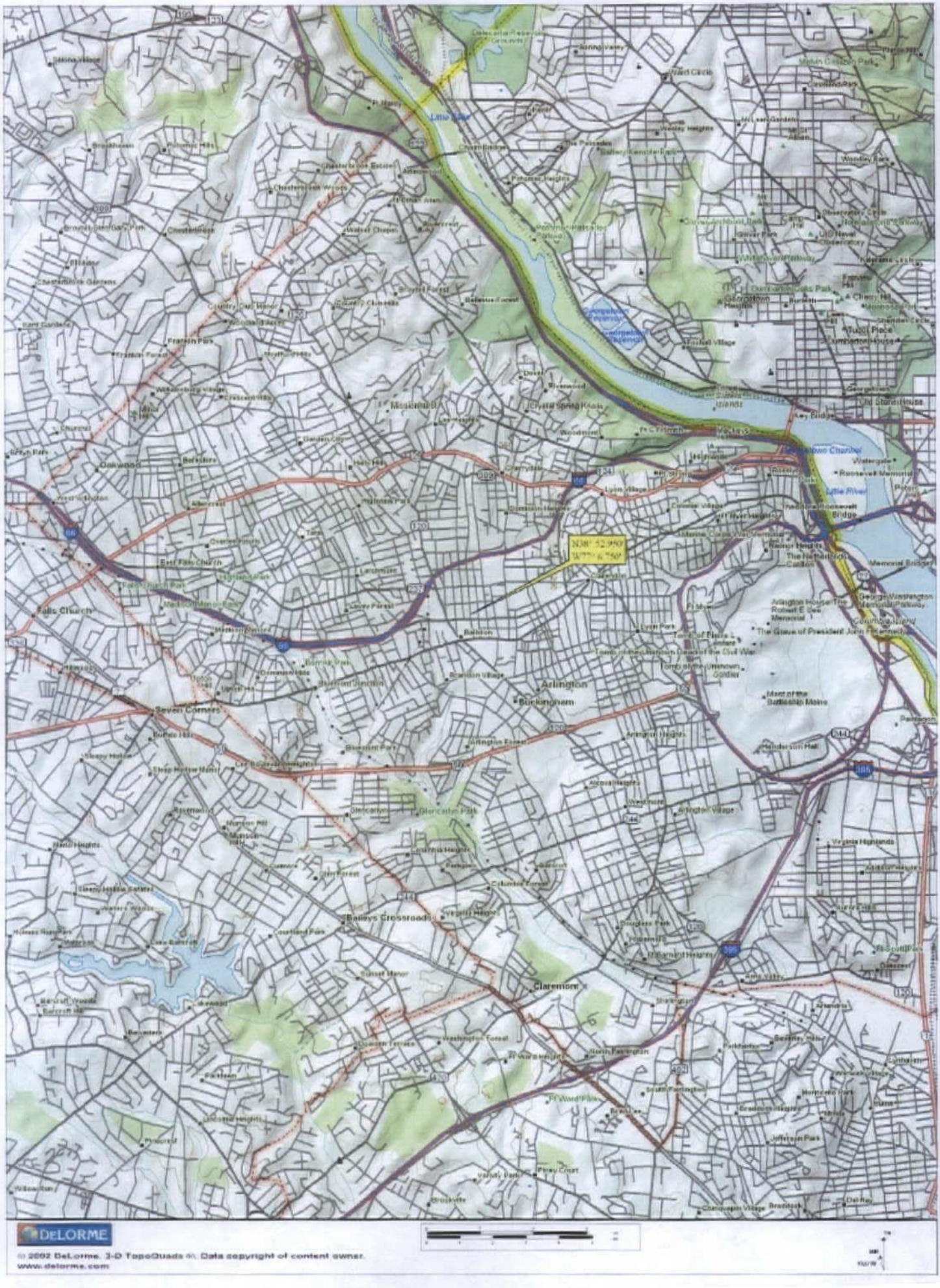
LOCATION: Foulger Pratt – The Nature Conservacy
4245 North Fairfax Drive, Arlington, Virginia 22203

GeoTrans, Inc. A FUTURA TECH COMPANY

CHECKED	MM
DRAFTED	CP
FILE	5805002002A.DWG
DATE	4-4-03

FIGURE: 1

Attachment 3



Attachment 4

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE
13901 Crown Court, Woodbridge, Virginia 22193
(703) 583-3800 Fax (703) 583-3821
www.deq.virginia.gov

Douglas W. Domenech
Secretary of Natural Resources

David K. Paylor
Director

Thomas Faha
Regional Director

December 14, 2011

Mr. John Dwelly
Vice President
The Nature Conservancy
4245 Fairfax Drive
Arlington, VA 22203

Re: The Nature Conservancy Inspection, Permit VA0089796

Dear Mr. Dwelly:

Attached is a copy of the Inspection Report generated while conducting a Facility Technical and Laboratory Inspection at The Nature Conservancy facility on November 17, 2011. This letter is not intended as a case decision under the Virginia Administrative Process Act, Va. Code § 2.2-4000 *et seq.* (APA). The compliance inspection staff would like to thank Mr. Justin Cooper and Mr. Danny King for their time and assistance during the inspection.

A written response regarding the items in the Request for Corrective Action is due to this office by January 15, 2012. Your response may be sent either via the US Postal Service or electronically, via E-mail. If you choose to send your response electronically, we recommend sending it as an Acrobat PDF or in a Word-compatible, write-protected format. Additional inspections may be conducted to confirm the facility is in compliance with permit requirements.

If you have any questions or comments concerning this report, please feel free to contact me at the Northern Regional Office at (703) 583-3909 or by E-mail at Rebecca.Johnson@deq.virginia.gov.

Sincerely,

Rebecca J. Johnson

Rebecca Johnson
Environmental Specialist II

cc: Permit/DMR File;
cc electronic: Compliance Manager; Compliance Auditor – DEQ
Mr. Justin Cooper, Tetra Tech

Attachment 5

Virginia Department of Environmental Quality

WASTEWATER FACILITY INSPECTION REPORT

FACILITY NAME: The Nature Conservancy		**INSPECTION DATE:**	11/17/11
		INSPECTOR	Rebecca Johnson
PERMIT No.: VA0089796		**REPORT DATE:**	12/14/11
TYPE OF FACILITY: ☐ Municipal ☑ Small Minor ☑ Industrial ☐ Federal		**TIME OF INSPECTION:**	1020 — 1130
		TOTAL TIME SPENT (including prep & travel)	9 Hours
PHOTOGRAPHS: ☑ Yes ☐ No		**UNANNOUNCED INSPECTION?**	☐ Yes ☑ No
REVIEWED BY / Date: Earl L. Stall 12/14/11			
PRESENT DURING INSPECTION:	Doug Frasier – DEQ Justin Cooper – Tetra Tech Danny King – The Nature Conservancy		

TECHNICAL INSPECTION

1. Has there been any new construction? • If so, were plans and specifications approved? Comments:	☐ Yes ☑ No
2. Is the Operations and Maintenance Manual approved and up-to-date? Comments:	☑ Yes ☐ No
3. Are the Permit and/or Operation and Maintenance Manual specified licensed operator being met? Comments:	☑ Yes ☐ No
4. Are the Permit and/or Operation and Maintenance Manual specified operator staffing requirements being met? Comments:	☑ Yes ☐ No
5. Is there an established and adequate program for training personnel? Comments:	☑ Yes ☐ No
6. Are preventive maintenance task schedules being met? Comments:	☑ Yes ☐ No
7. Does the plant experience any organic or hydraulic overloading? **N/A** Comments:	☐ Yes ☐ No
8. Has there been any bypassing or overflows since the last inspection? Comments:	☐ Yes ☑ No
9. Is the standby generator (including power transfer switch) operational and exercised regularly? **N/A** Comments:	☐ Yes ☐ No
10. Is the plant alarm system operational and tested regularly? Comments:	☑ Yes ☐ No

VA DEQ Wastewater Facility Inspection Report

Permit #	VA0089796

TECHNICAL INSPECTION

11. Is sludge disposed of in accordance with the approved sludge management plan? **N/A** Comments:	☐ Yes ☐ No
12. Is septage received? **N/A** • If so, is septage loading controlled, and are appropriate records maintained? Comments:	☐ Yes ☐ No
13. Are all plant records (operational logs, equipment maintenance, industrial waste contributors, sampling and testing) available for review and are records adequate? Comments:	☑ Yes ☐ No

14. Which of the following records does the plant maintain?

☑ Operational logs ☑ Instrument maintenance & calibration

☑ Mechanical equipment maintenance ☐ Industrial Waste Contribution (Municipal facilities)

Comments:

15. What does the operational log contain?

☑ Visual observations ☑ Flow Measurement ☐ Laboratory results ☐ Process adjustments

☐ Control calculations ☐ Other (specify)

Comments:

16. What do the mechanical equipment records contain?

☑ As built plans and specs ☑ Manufacturers instructions ☑ Lubrication schedules

☑ Spare parts inventory ☑ Equipment/parts suppliers

☐ Other (specify)

Comments:

17. What do the industrial waste contribution records contain (Municipal only)? **N/A**

☐ Waste characteristics ☐ Impact on plant ☐ Locations and discharge types

☐ Other (specify)

Comments:

18. Which of the following records are kept at the plant and available to personnel?

☑ Equipment maintenance records ☑ Operational log ☐ Industrial contributor records

☐ Instrumentation records ☐ Sampling and testing records

Comments:

19. List records not normally available to plant personnel and their location:

Comments: **Chain of Custodies, DMR's and pH calibration records**

20. Are the records maintained for the required time period (three or five years)? Comments:	☑ Yes ☐ No

VA DEQ Wastewater Facility Inspection Report

Permit #	VA0089796

UNIT PROCESS EVALUATION SUMMARY SHEET

UNIT PROCESS	APPLICABLE	PROBLEMS*	COMMENTS
Sewage Pumping			
Flow Measurement (Influent)			
Screening/Comminution			
Grit Removal			
Oil/Water Separator			
Flow Equalization			
Ponds/Lagoons			
Imhoff Tank			
Primary Sedimentation			
Trickling Filter			
Septic Tank and Sand Filter			
Rotating Biological Contactor			
Activated Sludge Aeration			
Biological Nutrient Removal			
Sequencing Batch Reactor			
Secondary Sedimentation			
Flocculation			
Tertiary Sedimentation			
Filtration			
Micro-Screening			
Airstripper	X		No problems observed
Activated Carbon Adsorption	X		No problems observed
Chlorination			
Dechlorination			
Ozonation			
Ultraviolet Disinfection			
Post Aeration			
Flow Measurement (Effluent)	X		No problems observed
Land Application (Effluent)			
Plant Outfall	X		No problems observed
Sludge Pumping			
Flotation Thickening (DAF)			
Gravity Thickening			
Aerobic Digestion			
Anaerobic Digestion			
Lime Stabilization			
Centrifugation			
Sludge Press			
Vacuum Filtration			
Drying Beds			
Thermal Treatment			
Incineration			
Composting			
Land Application (Sludge)			

* Problem Codes

1. Unit Needs Attention
2. Abnormal Influent/Effluent
3. Evidence of Equipment Failure
4. Unapproved Modification or Temporary Repair
5. Evidence of Process Upset
6. Other (explain in comments)

VA DEQ Wastewater Facility Inspection Report

Permit #	VA0089796

INSPECTION OVERVIEW AND CONDITION OF TREATMENT UNITS

- Mr. Doug Frasier and I arrived onsite at 10:20 a.m. We met with Mr. Danny King, Chief Building Engineer.
- Mr. King escorted us to the parking garage where the treatment unit is located.
- The building is located on a former remediation site (gas station and auto repair shop)
- Groundwater drains to the lowest subgrade floor and is collected in the recovery sump.
- Samples are collected at the influent and effluent sample collection point of the airstripper. **Photos 1 – 3**
- Water is then pumped through an airstripper to transfer the VOCs from water to air. Mr. Cooper informed DEQ staff that the airstripper is cleaned annually using simple green and a power washing unit. **Photo 3**
- The air passes through the carbon filtration unit before it is discharged to the atmosphere. Mr. King said the filters are changed monthly. The filter was changed November 15, 2011. **Photos 3 & 4**
- The flow is recorded via a totalizer.
- No problems were observed with any of the units.
- Mr. Frasier and I departed at 11:30 a.m.

VA DEQ Wastewater Facility Inspection Report

Permit #	VA0089796

EFFLUENT FIELD DATA: N/A

Flow	MGD	**Dissolved Oxygen**	mg/L	**TRC (Contact Tank)**	mg/L
pH	S.U.	**Temperature**	°C	**TRC (Final Effluent)**	mg/L

Was a Sampling Inspection conducted? ☐ Yes (see Sampling Inspection Report) ☑ No

CONDITION OF OUTFALL AND EFFLUENT CHARACTERISTICS:

1. Type of outfall: ☐ Shore based ☐ Submerged Diffuser? ☐ Yes ☐ No
2. Are the outfall and supporting structures in good condition? ☐ Yes ☐ No
3. Final Effluent (evidence of following problems): ☐ Sludge bar ☐ Grease ☐ Turbid effluent ☐ Visible foam ☐ Unusual color ☐ Oil sheen
4. Is there a visible effluent plume in the receiving stream? ☐ Yes ☐ No
5. Receiving stream: ☐ No observed problems ☐ Indication of problems (explain below)

Comments: **The facility has influent and effluent sample collection points at the treatment unit. No problems were observed.**

REQUEST for CORRECTIVE ACTION:

1. **Submit documentation of the initial demonstration of capabilities (IDC) for the next monitoring event to DEQ-NRO. See the attached document for instructions on how to complete the IDC.**
2. **Submit documentation from Field Environmental of the annual certification of the pH meter against an NIST thermometer for the next monitoring event to DEQ-NRO.**

NOTES and COMMENTS:

The facility appeared to be well maintained. Both Mr. King and Mr. Cooper should be commended on their efforts at maintaining a well cleaned treatment unit.

VA DEQ Wastewater Facility Inspection Report

LABORATORY INSPECTION REPORT SUMMARY

FACILITY NAME: The Nature Conservancy	FACILITY NO: VA0089796	INSPECTION DATE: November 17, 2011
(X) Deficiencies	( ) No Deficiencies	

LABORATORY RECORDS

The Laboratory Records section had **No Deficiencies** noted during the inspection.

GENERAL SAMPLING AND ANALYSIS

The General Sampling and Analysis section had **No Deficiencies** noted during the inspection.

LABORATORY EQUIPMENT

The Laboratory Equipment section had **No Deficiencies** noted during the inspection.

INDIVIDUAL PARAMETERS

pH

The analysis for the parameter pH had **Deficiencies** noted during the inspection.

- **The initial demonstration has not been performed for the operations staff.**
- **There was no documentation of the annual NIST certification for the pH meter rented by the facility.**

VA DEQ Wastewater Facility Inspection Report

DEPARTMENT OF ENVIRONMENTAL QUALITY - WATER DIVISION
LABORATORY INSPECTION REPORT

10/01

FACILITY NO:	INSPECTION DATE:	LAST INSPECTION:	PREVIOUS EVALUATION:	TIME SPENT:
VA0089796	November 17, 2011	November 1, 2006	No Deficiencies	1 hours

NAME/ADDRESS OF FACILITY:	FACILITY CLASS:	FACILITY TYPE:	UNANNOUNCED INSPECTION?
The Nature Conservancy 4245 Fairfax Drive Arlington, VA 22203	( ) MAJOR ( ) MINOR (X) SMALL ( ) VPA/NDC	( ) MUNICIPAL (X) INDUSTRIAL ( ) FEDERAL ( ) COMMERCIAL LAB	( ) YES (X) NO **FY-SCHEDULED INSPECTION?** (X) YES ( ) NO

INSPECTOR(S):	REVIEWERS:	PRESENT AT INSPECTION:
Rebecca Johnson	Edward L. Stahl	Mr. King and Mr. Cooper

LABORATORY EVALUATION	DEFICIENCIES? Yes	No
LABORATORY RECORDS		X
GENERAL SAMPLING & ANALYSIS		X
LABORATORY EQUIPMENT		X
QUALTIY ASSURANCE/QUALITY CONTROL		X
pH ANALYSIS PROCEDURES	X	

QUALITY ASSURANCE/QUALITY CONTROL

Y/N	QUALITY ASSURANCE METHOD	PARAMETERS	FREQUENCY
	REPLICATE SAMPLES		
	SPIKED SAMPLES		
	STANDARD SAMPLES	pH	Daily as needed
	SPLIT SAMPLES		
	SAMPLE BLANKS		
	OTHER		
	EPA-DMR QA DATA?	RATING: (X) No Deficiency ( ) Deficiency ( ) NA	
	QC SAMPLES PROVIDED?	RATING: ( ) No Deficiency ( ) Deficiency ( ) NA	

VA DEQ Wastewater Facility Inspection Report

FACILITY #: **VA0089796**

LABORATORY RECORDS SECTION

LABORATORY RECORDS INCLUDE THE FOLLOWING:

X	SAMPLING DATE	X	ANALYSIS DATE		CONT MONITORING CHART
X	SAMPLING TIME	X	ANALYSIS TIME	X	INSTRUMENT CALIBRATION
X	SAMPLE LOCATION	X	TEST METHOD	X	INSTRUMENT MAINTENANCE
				X	CERTIFICATE OF ANALYSIS

WRITTEN INSTRUCTIONS INCLUDE THE FOLLOWING:

X	SAMPLING SCHEDULES		CALCULATIONS	X	ANALYSIS PROCEDURES

	YES	NO	N/A
DO ALL ANALYSTS INITIAL THEIR WORK?	X		
DO BENCH SHEETS INCLUDE ALL INFORMATION NECESSARY TO DETERMINE RESULTS?	X		
IS THE DMR COMPLETE AND CORRECT? MONTH(S) REVIEWED: **Jan – June 2010, June – Dec 2010, and Jan-June 2011**	X		
ARE ALL MONITORING VALUES REQUIRED BY THE PERMIT REPORTED?	X		

GENERAL SAMPLING AND ANALYSIS SECTION

	YES	NO	N/A
ARE SAMPLE LOCATION(S) ACCORDING TO PERMIT REQUIREMENTS?	X		
ARE SAMPLE COLLECTION PROCEDURES APPROPRIATE?	X		
IS SAMPLE EQUIPMENT CONDITION ADEQUATE?	X		
IS FLOW MEASUREMENT ACCORDING TO PERMIT REQUIREMENTS?	X		
ARE COMPOSITE SAMPLES REPRESENTATIVE OF FLOW?			X
ARE SAMPLE HOLDING TIMES AND PRESERVATION ADEQUATE?	X		
IF ANALYSIS IS PERFORMED AT ANOTHER LOCATION, ARE SHIPPING PROCEDURES ADEQUATE? LIST PARAMETERS AND NAME & ADDRESS OF LAB: **(TCE, Ethylbenzene, Vinyl Chloride, Benzene, 1,1,1 Trichloroethane, Tetrachloroethlyene, Toluene, Chloroform, Carbon Tetrachloride, VOCs, Xylene, 1,1 Dichloroethlyene, Dichlorobenzene, 1,2, Dichloroethane, Trans-1,2-dichloroethylene, Cis-1,2-dichloroethylene, and Dichloromethane)** **Martel Laboratories Inc. (VELAP ID: 460017)** **1025 Cromwell Bridge Road** **Baltimore, MD 21286**	X		

LABORATORY EQUIPMENT SECTION

	YES	NO	N/A
IS LABORATORY EQUIPMENT IN PROPER OPERATING RANGE?	X		
ARE ANNUAL THERMOMETER CALIBRATION(S) ADEQUATE?	X		
IS THE LABORATORY GRADE WATER SUPPLY ADEQUATE?			X
ARE ANALYTICAL BALANCE(S) ADEQUATE?			X

VA DEQ Wastewater Facility Inspection Report

ANALYST:	Justin Cooper	VPDES NO	VA0089796

Parameter: Hydrogen Ion (pH)
Method: Electrometric
01/08

Meter: **Field Environmental Rental Equipment**

METHOD OF ANALYSIS

X	18th Edition of Standard Methods-4500-H-B
	21st or On-Line Edition of Standard Methods-4500-H-B (00)

		Y	N
	pH is a method defined analyte so modifications are not allowed. [40 CFR Part 136.6]		
1)	Is a certificate of operator competence or initial demonstration of capability available for each analyst/operator performing the analysis? **NOTE:** Analyze 4 samples of known pH. May use external source of buffer (different lot/manufacturer than buffers used to calibrate meter). Recovery for each of the 4 samples must be ± 0.1 SU of the known concentration of the sample. [SM 1020 B.1]		X
2)	Is the electrode in good condition (no chloride precipitate, etc.)? [2.b/c and 5.b]	*See Comments	
3)	Is electrode storage solution in accordance with manufacturer's instructions? [Mfr.]		
4)	Is meter calibrated on at least a daily basis using three buffers all of which are at the same temperature? [4.a] NOTE: Follow manufacturer's instructions.	X	
5)	After calibration, is a buffer analyzed as a check sample to verify that calibration is correct? Agreement should by within ± 0.1 SU. [4.a]	X	
6)	Do the buffer solutions appear to be free of contamination or growths? [3.1]	*See Comments	
7)	Are buffer solutions within their listed shelf life or have they been prepared within the last 4 weeks? [3.a]		
8)	Is the cap or sleeve covering the access hole on the reference electrode removed when measuring pH? [Mfr.]		
9)	For meters with ATC that also have temperature display, was the thermometer calibrated annually? [SM2550 B.1]		
10)	Is the temperature of buffer solutions and samples recorded when determining pH? [4.a]	X	
11)	Is sample analyzed within 15 minutes of collection? [40 CFR 136.6]	*See Comments	
12)	Was the electrode rinsed and then blotted dry between reading solutions (Disregard if a portion of the next sample analyzed is used as the rinse solution)? [4.a]		
13)	Is the sample stirred gently at a constant speed during measurement? [4.b]		
14)	Does the meter hold a steady reading after reaching equilibrium? [4.b]		
~~15)~~	~~Is a duplicate sample analyzed after every 20 samples if citing 18th or 19th Edition [1020 B.6] or daily for 20th or 21st Edition [Part 1020] Note: Not required for *in situ* samples.~~	NA	
~~16)~~	~~Is pH of duplicate samples within 0.1 SU of the original sample? [Part 1020]~~	NA	
~~17)~~	~~Is there a written procedure for which result will be reported on DMR (Sample or Duplicate) and is this procedure followed? [DEQ]~~	NA	

COMMENTS:	**9) Ensure the thermometer is certified against an NIST thermometer annually. On December 13, 2011, I spoke with the technician at Field Environmental and he informed me that a request must be made by the customer in order to ensure the pH meter that is rented to the customer is certified against an NIST thermometer. See Request for Corrective Action for more details.** ***Mr. Cooper rents a pH meters from Field Environmental to analyze the effluent pH at the facility. A thorough inspection of the pH meter was not conducted. According to the technician that I spoke to on December 13, 2011, Field Environmental services and calibrates the pH meter according to the manufacturer's specification.**

To:	Douglas Frasier
From:	Jennifer Carlson
Date:	July 27, 2012
Subject:	Planning Statement for The Nature Conservancy
Permit Number:	VA0089796

Information for Outfall 001:

Discharge Type: Industrial – groundwater treatment system (carbon/air stripper)
Discharge Flow: 0.0144 MGD
Receiving Stream: UT to Lubber Run
Latitude / Longitude: 38 52 57/-77 06 45
Rivermile: 0.27
Streamcode: 1aXHX
Waterbody: VAN-A12R
Water Quality Standards: Class III, Section 7, sp stds. b

1. Please provide water quality monitoring information for the receiving stream segment. If there is not monitoring information for the receiving stream segment, please provide information on the nearest downstream monitoring station, including how far downstream the monitoring station is from the outfall.

   This facility discharges to an unnamed tributary to Lubber Run (storm sewer). There is not any water quality monitoring data for the receiving stream. The nearest downstream DEQ monitoring station is 1aFOU004.22, located on Fourmile Run at the Route 244 bridge crossing, approximately 2.4 miles downstream of Outfall 001. The following is the water quality summary for this segment of Fourmile Run, as taken from the Draft 2012 Integrated Report*:

   Class III, Section 7, special stds. b.

   DEQ ambient monitoring stations 1aFOU001.92, at West Glebe Road, 1aFOU002.02, upstream of South Glebe Road, 1aFOU004.22, at Route 244, and 1aFOU005.60, at Carlyn Springs Road. Citizen monitoring stations 1aFOU-1-ACM, 1aFOU-2-ACM, 1aFOU-3-ACM, 1aFOU-4-ACM, 1aFOU-5-ACM, 1aFOU-6-ACM, 1aFOU-7-ACM, 1aFOU-8-ACM, 1aFOU-9-ACM, and 1aFOU-11-ACM.

   E. coli monitoring finds a bacterial impairment, resulting in an impaired classification for the recreation use. The E. coli data collected by the citizen monitoring group indicate that a water quality issue may exist for the recreation use. A bacteria TMDL for the Fourmile Run watershed has been completed and approved.

   The aquatic life and wildlife uses are considered fully supporting, with the aquatic life use noted with observed effects, described above.

   The fish consumption use is fully supporting with observed effects. SPMD data revealed an exceedance of the human health criteria of 0.64 parts per billion (ppb) for polychlorinated biphenyls (PCBs), which is noted with an observed effect. A PCB TMDL for the tidal Potomac River watershed has been completed and approved.

** The Draft 2012 Integrated Report (IR) has been through the public comment period and reviewed by EPA. The 2012 IR is currently being finalized and prepared for release.*

2. Does this facility discharge to a stream segment on the 303(d) list? If yes, please fill out Table A.

   No.

3. Are there any downstream 303(d) listed impairments that are relevant to this discharge? If yes, please fill out Table B.

   Yes.

Table B. Information on Downstream 303(d) Impairments and TMDLs

Waterbody Name	Impaired Use	Cause	Distance From Outfall	TMDL completed	WLA	Basis for WLA	TMDL Schedule
Impairment Information in the Draft 2012 Integrated Report*							
Fourmile Run	Recreation	*E. coli*	1.5 miles	Four Mile Run Bacteria 5/31/2002	None	---	N/A
Fourmile Run (Tidal)	Fish Consumption	PCB	5.1 miles	Tidal Potomac PCB 10/31/2007	None	---	N/A
		Chlordane	5.1 miles	N/A	---	---	2022

**The Draft 2012 Integrated Report (IR) has been through the public comment period and reviewed by EPA. The 2012 IR is currently being finalized and prepared for release.*

4. Is there monitoring or other conditions that Planning/Assessment needs in the permit?

   In support of the Potomac River PCB TMDL that was developed in 2007, this facility is a candidate for low-level PCB monitoring, based on its Standard Industrial Classification (SIC) code. Low-level PCB analysis uses EPA Method 1668B, which is capable of detecting low-level concentrations for all 209 PCB congeners. The Assessment/TMDL Staff has concluded that low-level PCB monitoring is not warranted for this facility, as it is not expected to be a source of PCBs. Based on this information, this facility will not be requested to monitor for low-level PCBs.

   There is a completed downstream TMDL for the aquatic life use impairment for the Chesapeake Bay. However, the Bay TMDL and the WLAs contained within the TMDL are not addressed in this planning statement.

5. Fact Sheet Requirements – Please provide information regarding any drinking water intakes located within a 5 mile radius of the discharge point.

   There are no public water supply intakes within a 5 mile radius of this facility's outfall.

FRESHWATER
WATER QUALITY CRITERIA / WASTELOAD ALLOCATION ANALYSIS

Facility Name: The Nature Conservancy Permit No.: VA0089796

Receiving Stream: Lubber Run, UT Version: OWP Guidance Memo 00-2011 (8/24/00)

Stream Information		Stream Flows		Mixing Information		Effluent Information	
Mean Hardness (as CaCO3) =	mg/L	1Q10 (Annual) =	0 MGD	Annual - 1Q10 Mix =	0 %	Mean Hardness (as CaCO3) =	50 mg/L
90% Temperature (Annual) =	deg C	7Q10 (Annual) =	0 MGD	- 7Q10 Mix =	0 %	90% Temp (Annual) =	25 deg C
90% Temperature (Wet season) =	deg C	30Q10 (Annual) =	0 MGD	- 30Q10 Mix =	0 %	90% Temp (Wet season) =	15 deg C
90% Maximum pH =	SU	1Q10 (Wet season) =	0 MGD	Wet Season - 1Q10 Mix =	0 %	90% Maximum pH =	8.1 SU
10% Maximum pH =	SU	30Q10 (Wet season)	0 MGD	- 30Q10 Mix =	0 %	10% Maximum pH =	7.4 SU
Tier Designation (1 or 2) =	1	30Q5 =	0 MGD			Discharge Flow =	0.0144 MGD
Public Water Supply (PWS) Y/N? =	n	Harmonic Mean =	0 MGD				
Trout Present Y/N? =	n						
Early Life Stages Present Y/N? =	y						

Parameter	Background	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
(ug/l unless noted)	Conc.	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Acenapthene	0	--	--	na	9.9E+02	--	--	na	9.9E+02	--	--	--	--	--	--	--	--	--	--	na	9.9E+02
Acrolein	0	--	--	na	9.3E+00	--	--	na	9.3E+00	--	--	--	--	--	--	--	--	--	--	na	9.3E+00
Acrylonitrile [C]	0	--	--	na	2.5E+00	--	--	na	2.5E+00	--	--	--	--	--	--	--	--	--	--	na	2.5E+00
Aldrin [C]	0	3.0E+00	--	na	5.0E-04	3.0E+00	--	na	5.0E-04	--	--	--	--	--	--	--	--	3.0E+00	--	na	5.0E-04
Ammonia-N (mg/l) (Yearly)	0	6.95E+00	1.07E+00	na	--	6.95E+00	1.07E+00	na	--	--	--	--	--	--	--	--	--	6.95E+00	1.07E+00	na	--
Ammonia-N (mg/l) (High Flow)	0	6.95E+00	2.03E+00	na	--	6.95E+00	2.03E+00	na	--	--	--	--	--	--	--	--	--	6.95E+00	2.03E+00	na	--
Anthracene	0	--	--	na	4.0E+04	--	--	na	4.0E+04	--	--	--	--	--	--	--	--	--	--	na	4.0E+04
Antimony	0	--	--	na	6.4E+02	--	--	na	6.4E+02	--	--	--	--	--	--	--	--	--	--	na	6.4E+02
Arsenic	0	3.4E+02	1.5E+02	na	--	3.4E+02	1.5E+02	na	--	--	--	--	--	--	--	--	--	3.4E+02	1.5E+02	na	--
Barium	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Benzene [C]	0	--	--	na	5.1E+02	--	--	na	5.1E+02	--	--	--	--	--	--	--	--	--	--	na	5.1E+02
Benzidine [C]	0	--	--	na	2.0E-03	--	--	na	2.0E-03	--	--	--	--	--	--	--	--	--	--	na	2.0E-03
Benzo (a) anthracene [C]	0	--	--	na	1.8E-01	--	--	na	1.8E-01	--	--	--	--	--	--	--	--	--	--	na	1.8E-01
Benzo (b) fluoranthene [C]	0	--	--	na	1.8E-01	--	--	na	1.8E-01	--	--	--	--	--	--	--	--	--	--	na	1.8E-01
Benzo (k) fluoranthene [C]	0	--	--	na	1.8E-01	--	--	na	1.8E-01	--	--	--	--	--	--	--	--	--	--	na	1.8E-01
Benzo (a) pyrene [C]	0	--	--	na	1.8E-01	--	--	na	1.8E-01	--	--	--	--	--	--	--	--	--	--	na	1.8E-01
Bis2-Chloroethyl Ether [C]	0	--	--	na	5.3E+00	--	--	na	5.3E+00	--	--	--	--	--	--	--	--	--	--	na	5.3E+00
Bis2-Chloroisopropyl Ether	0	--	--	na	6.5E+04	--	--	na	6.5E+04	--	--	--	--	--	--	--	--	--	--	na	6.5E+04
Bis 2-Ethylhexyl Phthalate [C]	0	--	--	na	2.2E+01	--	--	na	2.2E+01	--	--	--	--	--	--	--	--	--	--	na	2.2E+01
Bromoform [C]	0	--	--	na	1.4E+03	--	--	na	1.4E+03	--	--	--	--	--	--	--	--	--	--	na	1.4E+03
Butylbenzylphthalate	0	--	--	na	1.9E+03	--	--	na	1.9E+03	--	--	--	--	--	--	--	--	--	--	na	1.9E+03
Cadmium	0	1.8E+00	6.6E-01	na	--	1.8E+00	6.6E-01	na	--	--	--	--	--	--	--	--	--	1.8E+00	6.6E-01	na	--
Carbon Tetrachloride [C]	0	--	--	na	1.6E+01	--	--	na	1.6E+01	--	--	--	--	--	--	--	--	--	--	na	1.6E+01
Chlordane [C]	0	2.4E+00	4.3E-03	na	8.1E-03	2.4E+00	4.3E-03	na	8.1E-03	--	--	--	--	--	--	--	--	2.4E+00	4.3E-03	na	8.1E-03
Chloride	0	8.6E+05	2.3E+05	na	--	8.6E+05	2.3E+05	na	--	--	--	--	--	--	--	--	--	8.6E+05	2.3E+05	na	--
TRC	0	1.9E+01	1.1E+01	na	--	1.9E+01	1.1E+01	na	--	--	--	--	--	--	--	--	--	1.9E+01	1.1E+01	na	--
Chlorobenzene	0	--	--	na	1.6E+03	--	--	na	1.6E+03	--	--	--	--	--	--	--	--	--	--	na	1.6E+03

Attachment 7

Parameter	Background	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
(ug/l unless noted)	Conc.	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Chlorodibromomethane[C]	0	--	--	na	1.3E+02	--	--	na	1.3E+02	--	--	--	--	--	--	--	--	--	--	na	1.3E+02
Chloroform	0	--	--	na	1.1E+04	--	--	na	1.1E+04	--	--	--	--	--	--	--	--	--	--	na	1.1E+04
2-Chloronaphthalene	0	--	--	na	1.6E+03	--	--	na	1.6E+03	--	--	--	--	--	--	--	--	--	--	na	1.6E+03
2-Chlorophenol	0	--	--	na	1.5E+02	--	--	na	1.5E+02	--	--	--	--	--	--	--	--	--	--	na	1.5E+02
Chlorpyrifos	0	8.3E-02	4.1E-02	na	--	8.3E-02	4.1E-02	na	--	--	--	--	--	--	--	--	--	8.3E-02	4.1E-02	na	--
Chromium III	0	3.2E+02	4.2E+01	na	--	3.2E+02	4.2E+01	na	--	--	--	--	--	--	--	--	--	3.2E+02	4.2E+01	na	--
Chromium VI	0	1.6E+01	1.1E+01	na	--	1.6E+01	1.1E+01	na	--	--	--	--	--	--	--	--	--	1.6E+01	1.1E+01	na	--
Chromium, Total	0	--	--	1.0E+02	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Chrysene [C]	0	--	--	na	1.8E-02	--	--	na	1.8E-02	--	--	--	--	--	--	--	--	--	--	na	1.8E-02
Copper	0	7.0E+00	5.0E+00	na	--	7.0E+00	5.0E+00	na	--	--	--	--	--	--	--	--	--	7.0E+00	5.0E+00	na	--
Cyanide, Free	0	2.2E+01	5.2E+00	na	1.6E+04	2.2E+01	5.2E+00	na	1.6E+04	--	--	--	--	--	--	--	--	2.2E+01	5.2E+00	na	1.6E+04
DDD [C]	0	--	--	na	3.1E-03	--	--	na	3.1E-03	--	--	--	--	--	--	--	--	--	--	na	3.1E-03
DDE [C]	0	--	--	na	2.2E-03	--	--	na	2.2E-03	--	--	--	--	--	--	--	--	--	--	na	2.2E-03
DDT [C]	0	1.1E+00	1.0E-03	na	2.2E-03	1.1E+00	1.0E-03	na	2.2E-03	--	--	--	--	--	--	--	--	1.1E+00	1.0E-03	na	2.2E-03
Demeton	0	--	1.0E-01	na	--	--	1.0E-01	na	--	--	--	--	--	--	--	--	--	--	1.0E-01	na	--
Diazinon	0	1.7E-01	1.7E-01	na	--	1.7E-01	1.7E-01	na	--	--	--	--	--	--	--	--	--	1.7E-01	1.7E-01	na	--
Dibenz(a,h)anthracene [C]	0	--	--	na	1.8E-01	--	--	na	1.8E-01	--	--	--	--	--	--	--	--	--	--	na	1.8E-01
1,2-Dichlorobenzene	0	--	--	na	1.3E+03	--	--	na	1.3E+03	--	--	--	--	--	--	--	--	--	--	na	1.3E+03
1,3-Dichlorobenzene	0	--	--	na	9.6E+02	--	--	na	9.6E+02	--	--	--	--	--	--	--	--	--	--	na	9.6E+02
1,4-Dichlorobenzene	0	--	--	na	1.9E+02	--	--	na	1.9E+02	--	--	--	--	--	--	--	--	--	--	na	1.9E+02
3,3-Dichlorobenzidine[C]	0	--	--	na	2.8E-01	--	--	na	2.8E-01	--	--	--	--	--	--	--	--	--	--	na	2.8E-01
Dichlorobromomethane [C]	0	--	--	na	1.7E+02	--	--	na	1.7E+02	--	--	--	--	--	--	--	--	--	--	na	1.7E+02
1,2-Dichloroethane [C]	0	--	--	na	3.7E+02	--	--	na	3.7E+02	--	--	--	--	--	--	--	--	--	--	na	3.7E+02
1,1-Dichloroethylene	0	--	--	na	7.1E+03	--	--	na	7.1E+03	--	--	--	--	--	--	--	--	--	--	na	7.1E+03
1,2-trans-dichloroethylene	0	--	--	na	1.0E+04	--	--	na	1.0E+04	--	--	--	--	--	--	--	--	--	--	na	1.0E+04
2,4-Dichlorophenol	0	--	--	na	2.9E+02	--	--	na	2.9E+02	--	--	--	--	--	--	--	--	--	--	na	2.9E+02
2,4-Dichlorophenoxy acetic acid (2,4-D)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
1,2-Dichloropropane[C]	0	--	--	na	1.5E+02	--	--	na	1.5E+02	--	--	--	--	--	--	--	--	--	--	na	1.5E+02
1,3-Dichloropropene [C]	0	--	--	na	2.1E+02	--	--	na	2.1E+02	--	--	--	--	--	--	--	--	--	--	na	2.1E+02
Dieldrin [C]	0	2.4E-01	5.6E-02	na	5.4E-04	2.4E-01	5.6E-02	na	5.4E-04	--	--	--	--	--	--	--	--	2.4E-01	5.6E-02	na	5.4E-04
Diethyl Phthalate	0	--	--	na	4.4E+04	--	--	na	4.4E+04	--	--	--	--	--	--	--	--	--	--	na	4.4E+04
2,4-Dimethylphenol	0	--	--	na	8.5E+02	--	--	na	8.5E+02	--	--	--	--	--	--	--	--	--	--	na	8.5E+02
Dimethyl Phthalate	0	--	--	na	1.1E+06	--	--	na	1.1E+06	--	--	--	--	--	--	--	--	--	--	na	1.1E+06
Di-n-Butyl Phthalate	0	--	--	na	4.5E+03	--	--	na	4.5E+03	--	--	--	--	--	--	--	--	--	--	na	4.5E+03
2,4 Dinitrophenol	0	--	--	na	5.3E+03	--	--	na	5.3E+03	--	--	--	--	--	--	--	--	--	--	na	5.3E+03
2-Methyl-4,6-Dinitrophenol	0	--	--	na	2.8E+02	--	--	na	2.8E+02	--	--	--	--	--	--	--	--	--	--	na	2.8E+02
2,4-Dinitrotoluene [C]	0	--	--	na	3.4E+01	--	--	na	3.4E+01	--	--	--	--	--	--	--	--	--	--	na	3.4E+01
Dioxin 2,3,7,8-tetrachlorodibenzo-p-dioxin	0	--	--	na	5.1E-08	--	--	na	5.1E-08	--	--	--	--	--	--	--	--	--	--	na	5.1E-08
1,2-Diphenylhydrazine[C]	0	--	--	na	2.0E+00	--	--	na	2.0E+00	--	--	--	--	--	--	--	--	--	--	na	2.0E+00
Alpha-Endosulfan	0	2.2E-01	5.6E-02	na	8.9E+01	2.2E-01	5.6E-02	na	8.9E+01	--	--	--	--	--	--	--	--	2.2E-01	5.6E-02	na	8.9E+01
Beta-Endosulfan	0	2.2E-01	5.6E-02	na	8.9E+01	2.2E-01	5.6E-02	na	8.9E+01	--	--	--	--	--	--	--	--	2.2E-01	5.6E-02	na	8.9E+01
Alpha + Beta Endosulfan	0	2.2E-01	5.6E-02	--	--	2.2E-01	5.6E-02	--	--	--	--	--	--	--	--	--	--	2.2E-01	5.6E-02	--	--
Endosulfan Sulfate	0	--	--	na	8.9E+01	--	--	na	8.9E+01	--	--	--	--	--	--	--	--	--	--	na	8.9E+01
Endrin	0	8.6E-02	3.6E-02	na	6.0E-02	8.6E-02	3.6E-02	na	6.0E-02	--	--	--	--	--	--	--	--	8.6E-02	3.6E-02	na	6.0E-02
Endrin Aldehyde	0	--	--	na	3.0E-01	--	--	na	3.0E-01	--	--	--	--	--	--	--	--	--	--	na	3.0E-01

Parameter	Background	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
(ug/l unless noted)	Conc.	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Ethylbenzene	0	--	--	na	2.1E+03	--	--	na	2.1E+03	--	--	--	--	--	--	--	--	--	--	na	2.1E+03
Fluoranthene	0	--	--	na	1.4E+02	--	--	na	1.4E+02	--	--	--	--	--	--	--	--	--	--	na	1.4E+02
Fluorene	0	--	--	na	5.3E+03	--	--	na	5.3E+03	--	--	--	--	--	--	--	--	--	--	na	5.3E+03
Foaming Agents	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Guthion	0	--	1.0E-02	na	--	--	1.0E-02	na	--	--	--	--	--	--	--	--	--	--	1.0E-02	na	--
Heptachlor [c]	0	5.2E-01	3.8E-03	na	7.9E-04	5.2E-01	3.8E-03	na	7.9E-04	--	--	--	--	--	--	--	--	5.2E-01	3.8E-03	na	7.9E-04
Heptachlor Epoxide[c]	0	5.2E-01	3.8E-03	na	3.9E-04	5.2E-01	3.8E-03	na	3.9E-04	--	--	--	--	--	--	--	--	5.2E-01	3.8E-03	na	3.9E-04
Hexachlorobenzene[c]	0	--	--	na	2.9E-03	--	--	na	2.9E-03	--	--	--	--	--	--	--	--	--	--	na	2.9E-03
Hexachlorobutadiene[c]	0	--	--	na	1.8E+02	--	--	na	1.8E+02	--	--	--	--	--	--	--	--	--	--	na	1.8E+02
Hexachlorocyclohexane Alpha-BHC[c]	0	--	--	na	4.9E-02	--	--	na	4.9E-02	--	--	--	--	--	--	--	--	--	--	na	4.9E-02
Hexachlorocyclohexane Beta-BHC[c]	0	--	--	na	1.7E-01	--	--	na	1.7E-01	--	--	--	--	--	--	--	--	--	--	na	1.7E-01
Hexachlorocyclohexane Gamma-BHC[c] (Lindane)	0	9.5E-01	na	na	1.8E+00	9.5E-01	--	na	1.8E+00	--	--	--	--	--	--	--	--	9.5E-01	--	na	1.8E+00
Hexachlorocyclopentadiene	0	--	--	na	1.1E+03	--	--	na	1.1E+03	--	--	--	--	--	--	--	--	--	--	na	1.1E+03
Hexachloroethane[c]	0	--	--	na	3.3E+01	--	--	na	3.3E+01	--	--	--	--	--	--	--	--	--	--	na	3.3E+01
Hydrogen Sulfide	0	--	2.0E+00	na	--	--	2.0E+00	na	--	--	--	--	--	--	--	--	--	--	2.0E+00	na	--
Indeno (1,2,3-cd) pyrene [c]	0	--	--	na	1.8E-01	--	--	na	1.8E-01	--	--	--	--	--	--	--	--	--	--	na	1.8E-01
Iron	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Isophorone[c]	0	--	--	na	9.6E+03	--	--	na	9.6E+03	--	--	--	--	--	--	--	--	--	--	na	9.6E+03
Kepone	0	--	0.0E+00	na	--	--	0.0E+00	na	--	--	--	--	--	--	--	--	--	--	0.0E+00	na	--
Lead	0	4.9E+01	5.6E+00	na	--	4.9E+01	5.6E+00	na	--	--	--	--	--	--	--	--	--	4.9E+01	5.6E+00	na	--
Malathion	0	--	1.0E-01	na	--	--	1.0E-01	na	--	--	--	--	--	--	--	--	--	--	1.0E-01	na	--
Manganese	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Mercury	0	1.4E+00	7.7E-01	--	--	1.4E+00	7.7E-01	--	--	--	--	--	--	--	--	--	--	1.4E+00	7.7E-01	--	--
Methyl Bromide	0	--	--	na	1.5E+03	--	--	na	1.5E+03	--	--	--	--	--	--	--	--	--	--	na	1.5E+03
Methylene Chloride [c]	0	--	--	na	5.9E+03	--	--	na	5.9E+03	--	--	--	--	--	--	--	--	--	--	na	5.9E+03
Methoxychlor	0	--	3.0E-02	na	--	--	3.0E-02	na	--	--	--	--	--	--	--	--	--	--	3.0E-02	na	--
Mirex	0	--	0.0E+00	na	--	--	0.0E+00	na	--	--	--	--	--	--	--	--	--	--	0.0E+00	na	--
Nickel	0	1.0E+02	1.1E+01	na	4.6E+03	1.0E+02	1.1E+01	na	4.6E+03	--	--	--	--	--	--	--	--	1.0E+02	1.1E+01	na	4.6E+03
Nitrate (as N)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Nitrobenzene	0	--	--	na	6.9E+02	--	--	na	6.9E+02	--	--	--	--	--	--	--	--	--	--	na	6.9E+02
N-Nitrosodimethylamine[c]	0	--	--	na	3.0E+01	--	--	na	3.0E+01	--	--	--	--	--	--	--	--	--	--	na	3.0E+01
N-Nitrosodiphenylamine[c]	0	--	--	na	6.0E+01	--	--	na	6.0E+01	--	--	--	--	--	--	--	--	--	--	na	6.0E+01
N-Nitrosodi-n-propylamine[c]	0	--	--	na	5.1E+00	--	--	na	5.1E+00	--	--	--	--	--	--	--	--	--	--	na	5.1E+00
Nonylphenol	0	2.8E+01	6.6E+00	--	--	2.8E+01	6.6E+00	na	--	--	--	--	--	--	--	--	--	2.8E+01	6.6E+00	na	--
Parathion	0	6.5E-02	1.3E-02	na	--	6.5E-02	1.3E-02	na	--	--	--	--	--	--	--	--	--	6.5E-02	1.3E-02	na	--
PCB Total[c]	0	--	1.4E-02	na	6.4E-04	--	1.4E-02	na	6.4E-04	--	--	--	--	--	--	--	--	--	1.4E-02	na	6.4E-04
Pentachlorophenol [c]	0	1.3E+01	1.0E+01	na	3.0E+01	1.3E+01	1.0E+01	na	3.0E+01	--	--	--	--	--	--	--	--	1.3E+01	1.0E+01	na	3.0E+01
Phenol	0	--	--	na	8.6E+05	--	--	na	8.6E+05	--	--	--	--	--	--	--	--	--	--	na	8.6E+05
Pyrene	0	--	--	na	4.0E+03	--	--	na	4.0E+03	--	--	--	--	--	--	--	--	--	--	na	4.0E+03
Radionuclides	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Gross Alpha Activity (pCi/L)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Beta and Photon Activity (mrem/yr)	0	--	--	na	4.0E+00	--	--	na	4.0E+00	--	--	--	--	--	--	--	--	--	--	na	4.0E+00
Radium 226 + 228 (pCi/L)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Uranium (ug/l)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--

Parameter	Background	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
(ug/l unless noted)	Conc.	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Selenium, Total Recoverable	0	2.0E+01	5.0E+00	na	4.2E+03	2.0E+01	5.0E+00	na	4.2E+03	--	--	--	--	--	--	--	--	**2.0E+01**	**5.0E+00**	**na**	**4.2E+03**
Silver	0	1.0E+00	--	na	--	1.0E+00	--	na	--	--	--	--	--	--	--	--	--	**1.0E+00**	**--**	**na**	**--**
Sulfate	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**--**
1,1,2,2-Tetrachloroethane[C]	0	--	--	na	4.0E+01	--	--	na	4.0E+01	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**4.0E+01**
Tetrachloroethylene[C]	0	--	--	na	3.3E+01	--	--	na	3.3E+01	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**3.3E+01**
Thallium	0	--	--	na	4.7E-01	--	--	na	4.7E-01	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**4.7E-01**
Toluene	0	--	--	na	6.0E+03	--	--	na	6.0E+03	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**6.0E+03**
Total dissolved solids	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**--**
Toxaphene [C]	0	7.3E-01	2.0E-04	na	2.8E-03	7.3E-01	2.0E-04	na	2.8E-03	--	--	--	--	--	--	--	--	**7.3E-01**	**2.0E-04**	**na**	**2.8E-03**
Tributyltin	0	4.6E-01	7.2E-02	na	--	4.6E-01	7.2E-02	na	--	--	--	--	--	--	--	--	--	**4.6E-01**	**7.2E-02**	**na**	**--**
1,2,4-Trichlorobenzene	0	--	--	na	7.0E+01	--	--	na	7.0E+01	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**7.0E+01**
1,1,2-Trichloroethane[C]	0	--	--	na	1.6E+02	--	--	na	1.6E+02	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.6E+02**
Trichloroethylene [C]	0	--	--	na	3.0E+02	--	--	na	3.0E+02	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**3.0E+02**
2,4,6-Trichlorophenol [C]	0	--	--	na	2.4E+01	--	--	na	2.4E+01	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**2.4E+01**
2-(2,4,5-Trichlorophenoxy) propionic acid (Silvex)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**--**
Vinyl Chloride[C]	0	--	--	na	2.4E+01	--	--	na	2.4E+01	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**2.4E+01**
Zinc	0	6.5E+01	6.6E+01	na	2.6E+04	6.5E+01	6.6E+01	na	2.6E+04	--	--	--	--	--	--	--	--	**6.5E+01**	**6.6E+01**	**na**	**2.6E+04**

Notes:

1. All concentrations expressed as micrograms/liter (ug/l), unless noted otherwise
2. Discharge flow is highest monthly average or Form 2C maximum for Industries and design flow for Municipals
3. Metals measured as Dissolved, unless specified otherwise
4. "C" indicates a carcinogenic parameter
5. Regular WLAs are mass balances (minus background concentration) using the % of stream flow entered above under Mixing Information.
   Antidegradation WLAs are based upon a complete mix.
6. Antideg. Baseline = (0.25(WQC - background conc.) + background conc.) for acute and chronic
   = (0.1(WQC - background conc.) + background conc.) for human health
7. WLAs established at the following stream flows: 1Q10 for Acute, 30Q10 for Chronic Ammonia, 7Q10 for Other Chronic, 30Q5 for Non-carcinogens and Harmonic Mean for Carcinogens. To apply mixing ratios from a model set the stream flow equal to (mixing ratio - 1), effluent flow equal to 1 and 100% mix.

Metal	Target Value (SSTV)
Antimony	6.4E+02
Arsenic	9.0E+01
Barium	na
Cadmium	3.9E-01
Chromium III	2.5E+01
Chromium VI	6.4E+00
Copper	2.8E+00
Iron	na
Lead	3.4E+00
Manganese	na
Mercury	4.6E-01
Nickel	6.8E+00
Selenium	3.0E+00
Silver	4.2E-01
Zinc	2.6E+01

Note: do not use QL's lower than the minimum QL's provided in agency guidance

DMR QA/QC

Permit #:VA0089796

Facility:The Nature Conservancy

Rec'd	Parameter Description	QTY AVG	Lim Avg	QTY MAX	Lim Max	Quantity Unit Lim	CONC MIN	Lim Min	CONC AVG	Lim Avg	CONC MAX	Lim Max
10-Jul-2008 Jun 08	1,1,1-TRICHLOROETHANE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	<QL	112
19-Dec-2008	1,1,1-TRICHLOROETHANE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	<QL	112
15-May-2009	1,1,1-TRICHLOROETHANE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	<1	112
05-Oct-2009	1,1,1-TRICHLOROETHANE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	<1	112
24-Feb-2010	1,1,1-TRICHLOROETHANE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	<1	112
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27-May-2011	1,1,1-TRICHLOROETHANE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	<QL	112
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Attachment 8

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19-Dec-2008	FLOW	.001325	0.0144	0.001349	NL	MGD	NULL	**********	NULL	**********	NULL	**********
15-May-2009	FLOW	.001381	0.0144	0.001399	NL	MGD	NULL	**********	NULL	**********	NULL	**********
05-Oct-2009	FLOW	.001413	0.0144	0.001439	NL	MGD	NULL	**********	NULL	**********	NULL	**********
24-Feb-2010	FLOW	.000001	0.0144	0.000001	NL	MGD	NULL	**********	NULL	**********	NULL	**********
20-Oct-2010	FLOW	.000000	0.0144	0.000000	NL	MGD	NULL	**********	NULL	**********	NULL	**********
27-May-2011	FLOW	.003589	0.0144	0.014228	NL	MGD	NULL	**********	NULL	**********	NULL	**********
29-Dec-2011	FLOW	.000436	0.0144	.00079	NL	MGD	NULL	**********	NULL	**********	NULL	**********
13-Jun-2012	FLOW	.000517	0.0144	0.000802	NL	MGD	NULL	**********	NULL	**********	NULL	**********
10-Jul-2008	ORGANICS, TOTAL VOLATILE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	1.0	763
19-Dec-2008	ORGANICS, TOTAL VOLATILE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	5.5	763
15-May-2009	ORGANICS, TOTAL VOLATILE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	2.2	763
05-Oct-2009	ORGANICS, TOTAL VOLATILE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	2.2	763
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20-Oct-2010	ORGANICS, TOTAL VOLATILE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	9.5	763
27-May-2011	ORGANICS, TOTAL VOLATILE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	2.2	763
29-Dec-2011	ORGANICS, TOTAL VOLATILE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	<QL	763
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05-Oct-2009	PH	NULL	**********	NULL	**********	NULL	7.45	6.0	NULL	**********	8.02	9.0
24-Feb-2010	PH	NULL	**********	NULL	**********	NULL	7.46	6.0	NULL	**********	7.83	9.0
20-Oct-2010	PH	NULL	**********	NULL	**********	NULL	8.07	6.0	NULL	**********	8.32	9.0
27-May-2011	PH	NULL	**********	NULL	**********	NULL	7.90	6.0	NULL	**********	8.09	9.0
29-Dec-2011	PH	NULL	**********	NULL	**********	NULL	7.87	6.0	NULL	**********	8.14	9.0
13-Jun-2012	PH	NULL	**********	NULL	**********	NULL	6.78	6.0	NULL	**********	7.70	9.0
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19-Dec-2008	TETRACHLOROETHYLENE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	5.5	5
15-May-2009	TETRACHLOROETHYLENE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	1.2	5
05-Oct-2009	TETRACHLOROETHYLENE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	<1	5
24-Feb-2010	TETRACHLOROETHYLENE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	5.1	5
20-Oct-2010	TETRACHLOROETHYLENE	NULL	**********	NULL	**********	NULL	NULL	**********	NULL	**********	8.4	5

90th 8.1 10th 7.4

27-May-2011	TETRACHLOROETHYLENE	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	2.2	5
29-Dec-2011	TETRACHLOROETHYLENE	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	1.0	5
13-Jun-2012	TETRACHLOROETHYLENE	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<QL	5
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05-Oct-2009	TOLUENE (AS C7H8)	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<1	5
24-Feb-2010	TOLUENE (AS C7H8)	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<1	5
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27-May-2011	TOLUENE (AS C7H8)	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<QL	5
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24-Feb-2010	TRANS-1,2-DICHLOROETHYLENE	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<1	100
20-Oct-2010	TRANS-1,2-DICHLOROETHYLENE	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<1	100
27-May-2011	TRANS-1,2-DICHLOROETHYLENE	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<QL	100
29-Dec-2011	TRANS-1,2-DICHLOROETHYLENE	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<QL	100
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19-Dec-2008	VINYL CHLORIDE	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<QL	2
15-May-2009	VINYL CHLORIDE	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<1	2
05-Oct-2009	VINYL CHLORIDE	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<1	2
24-Feb-2010	VINYL CHLORIDE	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<1	2
20-Oct-2010	VINYL CHLORIDE	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<1	2
27-May-2011	VINYL CHLORIDE	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<QL	2
29-Dec-2011	VINYL CHLORIDE	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<QL	2
13-Jun-2012	VINYL CHLORIDE	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<QL	2
10-Jul-2008	XYLENE (AS C8H10)	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<QL	5
19-Dec-2008	XYLENE (AS C8H10)	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<QL	5
15-May-2009	XYLENE (AS C8H10)	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<1	5
05-Oct-2009	XYLENE (AS C8H10)	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<1	5

24-Feb-2010	XYLENE (AS C8H10)	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<1	5
20-Oct-2010	XYLENE (AS C8H10)	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<1	5
27-May-2011	XYLENE (AS C8H10)	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<QL	5
29-Dec-2011	XYLENE (AS C8H10)	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<QL	5
13-Jun-2012	XYLENE (AS C8H10)	NULL	*********	NULL	*********	NULL	NULL	*********	NULL	*********	<QL	5

Public Notice – Environmental Permit

PURPOSE OF NOTICE: To seek public comment on a draft permit from the Department of Environmental Quality that will allow the release of treated wastewater into a water body in Arlington County, Virginia.

PUBLIC COMMENT PERIOD: December 13, 2012 to 5:00 p.m. on January 14, 2013

PERMIT NAME: Virginia Pollutant Discharge Elimination System Permit – Wastewater issued by DEQ, under the authority of the State Water Control Board

APPLICANT NAME, ADDRESS AND PERMIT NUMBER: The Nature Conservancy
21335 Signal Hill Plaza, Suite 100, Sterling, VA 20164
VA0089796

NAME AND ADDRESS OF FACILITY: The Nature Conservancy
4245 North Fairfax Drive, Arlington, VA 22203

PROJECT DESCRIPTION: The Nature Conservancy has applied for a reissuance of a permit for the private The Nature Conservancy. The applicant proposes to release treated groundwater at a rate of 0.0144 million gallons per day into a water body. There is no sludge generated from the treatment process. The facility proposes to release the treated groundwater in the Lubber Run, UT in Arlington County in the Potomac River watershed. A watershed is the land area drained by a river and its incoming streams. The permit will limit the following pollutants to amounts that protect water quality: pH, benzene, toluene, ethylbenzene, total xylene, carbon tetrachloride, chloroform, 1,1,1-trichloroethane, 1,2-dichlorobenzene, 1,1-dichloroethylene, cis 1,2-dichloroethylene, trans 1,2-dichloroethylene, dichloromethane, trichloroethylene (TCE), tetrachloroethylene (PCE), 1,2-dichloroethane, vinyl chloride, 1,2-dichlorobenzene and total VOCs.

HOW TO COMMENT AND/OR REQUEST A PUBLIC HEARING: DEQ accepts comments and requests for public hearing by email, fax or postal mail. All comments and requests must be in writing and be received by DEQ during the comment period. Submittals must include the names, mailing addresses and telephone numbers of the commenter/requester and of all persons represented by the commenter/requester. A request for public hearing must also include: 1) The reason why a public hearing is requested. 2) A brief, informal statement regarding the nature and extent of the interest of the requester or of those represented by the requester, including how and to what extent such interest would be directly and adversely affected by the permit. 3) Specific references, where possible, to terms and conditions of the permit with suggested revisions. A public hearing may be held, including another comment period, if public response is significant, based on individual requests for a public hearing, and there are substantial, disputed issues relevant to the permit.

CONTACT FOR PUBLIC COMMENTS, DOCUMENT REQUESTS AND ADDITIONAL INFORMATION: The public may review the documents at the DEQ-Northern Regional Office by appointment, or may request electronic copies of the draft permit and fact sheet.

Name: Douglas Frasier
Address: DEQ-Northern Regional Office, 13901 Crown Court, Woodbridge, VA 22193
Phone: (703) 583-3873 Email: Douglas.Frasier@deq.virginia.gov Fax: (703) 583-3821

Attachment 9

State "Transmittal Checklist" to Assist in Targeting
Municipal and Industrial Individual NPDES Draft Permits for Review

Part I. State Draft Permit Submission Checklist

In accordance with the MOA established between the Commonwealth of Virginia and the United States Environmental Protection Agency, Region III, the Commonwealth submits the following draft National Pollutant Discharge Elimination System (NPDES) permit for Agency review and concurrence.

Facility Name:	The Nature Conservancy
NPDES Permit Number:	VA0089796
Permit Writer Name:	Douglas Frasier
Date:	1 November 2012

Major [ ] **Minor** [X] **Industrial** [X] **Municipal [ ]**

I.A. Draft Permit Package Submittal Includes:	**Yes**	**No**	**N/A**
1. Permit Application?	X		
2. Complete Draft Permit (for renewal or first time permit – entire permit, including boilerplate information)?	X		
3. Copy of Public Notice?	X		
4. Complete Fact Sheet?	X		
5. A Priority Pollutant Screening to determine parameters of concern?			X
6. A Reasonable Potential analysis showing calculated WQBELs?			X
7. Dissolved Oxygen calculations?			X
8. Whole Effluent Toxicity Test summary and analysis?			X
9. Permit Rating Sheet for new or modified industrial facilities?	X		

I.B. Permit/Facility Characteristics	**Yes**	**No**	**N/A**
1. Is this a new, or currently unpermitted facility?		X	
2. Are all permissible outfalls (including combined sewer overflow points, non-process water and storm water) from the facility properly identified and authorized in the permit?	X		
3. Does the fact sheet **or** permit contain a description of the wastewater treatment process?	X		
4. Does the review of PCS/DMR data for at least the last 3 years indicate significant non-compliance with the existing permit?		X	
5. Has there been any change in streamflow characteristics since the last permit was developed?		X	
6. Does the permit allow the discharge of new or increased loadings of any pollutants?		X	
7. Does the fact sheet **or** permit provide a description of the receiving water body(s) to which the facility discharges, including information on low/critical flow conditions and designated/existing uses?	X		
8. Does the facility discharge to a 303(d) listed water? **DOWNSTREAM**		X	
a. Has a TMDL been developed and approved by EPA for the impaired water? **DOWNSTREAM**	X		
b. Does the record indicate that the TMDL development is on the State priority list and will most likely be developed within the life of the permit?			X
c. Does the facility discharge a pollutant of concern identified in the TMDL or 303(d) listed water?		X	
9. Have any limits been removed, or are any limits less stringent, than those in the current permit?		X	
10. Does the permit authorize discharges of storm water?		X	
I.B. Permit/Facility Characteristics – cont.	**Yes**	**No**	**N/A**
11. Has the facility substantially enlarged or altered its operation or substantially increased its flow or production?		X	
12. Are there any production-based, technology-based effluent limits in the permit?	X		

Attachment 10

I.B. Permit/Facility Characteristics – cont.	Yes	No	N/A
11. Has the facility substantially enlarged or altered its operation or substantially increased its flow or production?		X	
12. Are there any production-based, technology-based effluent limits in the permit?	X		
13. Do any water quality-based effluent limit calculations differ from the State's standard policies or procedures?			X
14. Are any WQBELs based on an interpretation of narrative criteria?			X
15. Does the permit incorporate any variances or other exceptions to the State's standards or regulations?		X	
16. Does the permit contain a compliance schedule for any limit or condition?		X	
17. Is there a potential impact to endangered/threatened species or their habitat by the facility's discharge(s)?	X		
18. Have impacts from the discharge(s) at downstream potable water supplies been evaluated?	X		
19. Is there any indication that there is significant public interest in the permit action proposed for this facility?		X	
20. Have previous permit, application, and fact sheet been examined?	X		

Part II. NPDES Draft Permit Checklist

Region III NPDES Permit Quality Review Checklist – For Non-Municipals

(To be completed and included in the record for all non-POTWs)

II.A. Permit Cover Page/Administration	**Yes**	**No**	**N/A**
1. Does the fact sheet **or** permit describe the physical location of the facility, including latitude and longitude (not necessarily on permit cover page)?	X		
2. Does the permit contain specific authorization-to-discharge information (from where to where, by whom)?	X		

II.B. Effluent Limits – General Elements	**Yes**	**No**	**N/A**
1. Does the fact sheet describe the basis of final limits in the permit (e.g., that a comparison of technology and water quality-based limits was performed, and the most stringent limit selected)?	X		
2. Does the fact sheet discuss whether "antibacksliding" provisions were met for any limits that are less stringent than those in the previous NPDES permit?			X

II.C. Technology-Based Effluent Limits (Effluent Guidelines & BPJ)	**Yes**	**No**	**N/A**
1. Is the facility subject to a national effluent limitations guideline (ELG)?		X	
a. If yes, does the record adequately document the categorization process, including an evaluation of whether the facility is a new source or an existing source?			X
b. If no, does the record indicate that a technology-based analysis based on Best Professional Judgement (BPJ) was used for all pollutants of concern discharged at treatable concentrations?	X		
2. For all limits developed based on BPJ, does the record indicate that the limits are consistent with the criteria established at 40 CFR 125.3(d)?			X
3. Does the fact sheet adequately document the calculations used to develop both ELG and /or BPJ technology-based effluent limits?		X	
4. For all limits that are based on production or flow, does the record indicate that the calculations are based on a "reasonable measure of ACTUAL production" for the facility (not design)?			X
5. Does the permit contain "tiered" limits that reflect projected increases in production or flow?		X	
a. If yes, does the permit require the facility to notify the permitting authority when alternate levels of production or flow are attained?			X
6. Are technology-based permit limits expressed in appropriate units of measure (e.g., concentration, mass, SU)?	X		
7. Are all technology-based limits expressed in terms of both maximum daily, weekly average, and/or monthly average limits?		X	
8. Are any final limits less stringent than required by applicable effluent limitations guidelines or BPJ?		X	

II.D. Water Quality-Based Effluent Limits	**Yes**	**No**	**N/A**
1. Does the permit include appropriate limitations consistent with 40 CFR 122.44(d) covering State narrative and numeric criteria for water quality?	X		
2. Does the record indicate that any WQBELs were derived from a completed and EPA approved TMDL?			X
3. Does the fact sheet provide effluent characteristics for each outfall?	X		
4. Does the fact sheet document that a "reasonable potential" evaluation was performed?	X		
a. If yes, does the fact sheet indicate that the "reasonable potential" evaluation was performed in accordance with the State's approved procedures?	X		
b. Does the fact sheet describe the basis for allowing or disallowing in-stream dilution or a mixing zone?			X

II.D. Water Quality-Based Effluent Limits – cont.	Yes	No	N/A
c. Does the fact sheet present WLA calculation procedures for all pollutants that were found to have "reasonable potential"?	X		
d. Does the fact sheet indicate that the "reasonable potential" and WLA calculations accounted for contributions from upstream sources (i.e., do calculations include ambient/background concentrations where data are available)?			X
e. Does the permit contain numeric effluent limits for all pollutants for which "reasonable potential" was determined?	X		
5. Are all final WQBELs in the permit consistent with the justification and/or documentation provided in the fact sheet?			X
6. For all final WQBELs, are BOTH long-term (e.g., average monthly) AND short-term (e.g., maximum daily, weekly average, instantaneous) effluent limits established?			X
7. Are WQBELs expressed in the permit using appropriate units of measure (e.g., mass, concentration)?			X
8. Does the fact sheet indicate that an "antidegradation" review was performed in accordance with the State's approved antidegradation policy?	X		

II.E. Monitoring and Reporting Requirements	Yes	No	N/A
1. Does the permit require at least annual monitoring for all limited parameters?	X		
a. If no, does the fact sheet indicate that the facility applied for and was granted a monitoring waiver, AND, does the permit specifically incorporate this waiver?			
2. Does the permit identify the physical location where monitoring is to be performed for each outfall?		X	
3. Does the permit require testing for Whole Effluent Toxicity in accordance with the State's standard practices?			X

II.F. Special Conditions	Yes	No	N/A
1. Does the permit require development and implementation of a Best Management Practices (BMP) plan or site-specific BMPs?		X	
a. If yes, does the permit adequately incorporate and require compliance with the BMPs?			X
2. If the permit contains compliance schedule(s), are they consistent with statutory and regulatory deadlines and requirements?			X
3. Are other special conditions (e.g., ambient sampling, mixing studies, TIE/TRE, BMPs, special studies) consistent with CWA and NPDES regulations?			X

II.G. Standard Conditions	Yes	No	N/A
1. Does the **permit** contain all 40 CFR 122.41 standard conditions or the State equivalent (or more stringent) conditions?	X		

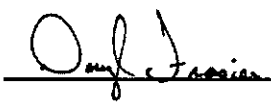
List of Standard Conditions – 40 CFR 122.41

Duty to comply	Property rights	Reporting Requirements
Duty to reapply	Duty to provide information	Planned change
Need to halt or reduce activity not a defense	Inspections and entry	Anticipated noncompliance
	Monitoring and records	Transfers
Duty to mitigate	Signatory requirement	Monitoring reports
Proper O & M	Bypass	Compliance schedules
Permit actions	Upset	24-Hour reporting
		Other non-compliance

2. Does the permit contain the additional standard condition (or the State equivalent or more stringent conditions) for existing non-municipal dischargers regarding pollutant notification levels [40 CFR 122.42(a)]?		X	

Part III. Signature Page

Based on a review of the data and other information submitted by the permit applicant, and the draft permit and other administrative records generated by the Department/Division and/or made available to the Department/Division, the information provided on this checklist is accurate and complete, to the best of my knowledge.

Name	Douglas Frasier
Title	VPDES Permit Writer, Senior II
Signature	
Date	1 November 2012